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RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9
HAZARDOUS WASTE MANAGEMENT DIVISION

Purpose: RCRA Compliance Evaluation Inspection

Facility: Evergreen Oil Inc.
Newark, California 94560

Facility ID Number: CAD980887418

Date of Inspection: July 11, 1991

EPA Representatives:

Daniel Prime, Environmental Scientist

Patrick Kuefler, Environmental Scientist

Perriann Wood, Environmental Scientist

California Environmental Protection Agency Representative:

Kwiyukwa Madoshi
(415) 540-3961

Facility Representatives:

Jane Burns
Environmental Manager
(415) 795-4400

Kirk Hayward
Vice-President
(415) 795-4410

Curtis E. Morgan
President

Report Prepared by:

Patrick Kuefler
Environmental Scientist
(415) 744-2144

INTRODUCTION

Evergreen Oil Inc. (EOI) is primarily a used oil recycling facility which operates a fleet of bobtail trucks that collect used oil. EOI services approximately 1200 customers in Northern California and select locations in Nevada. EOI also operates a used oil recycling refinery in Newark, California which produces at least five distinct products: diesel grade fuel, lube distillate (a fuel), 300 neutral lube oil, 100 neutral lube oil and an asphalt flux. EOI also transports highly contaminated oil (> 1000 ppm total chlorine) from the generator to Systech for disposal.(Attachments H & K) EOI services a wide array of businesses including service stations, automotive repair facilities, and quick oil change businesses which generate used oil as part of vehicle maintenance activities.

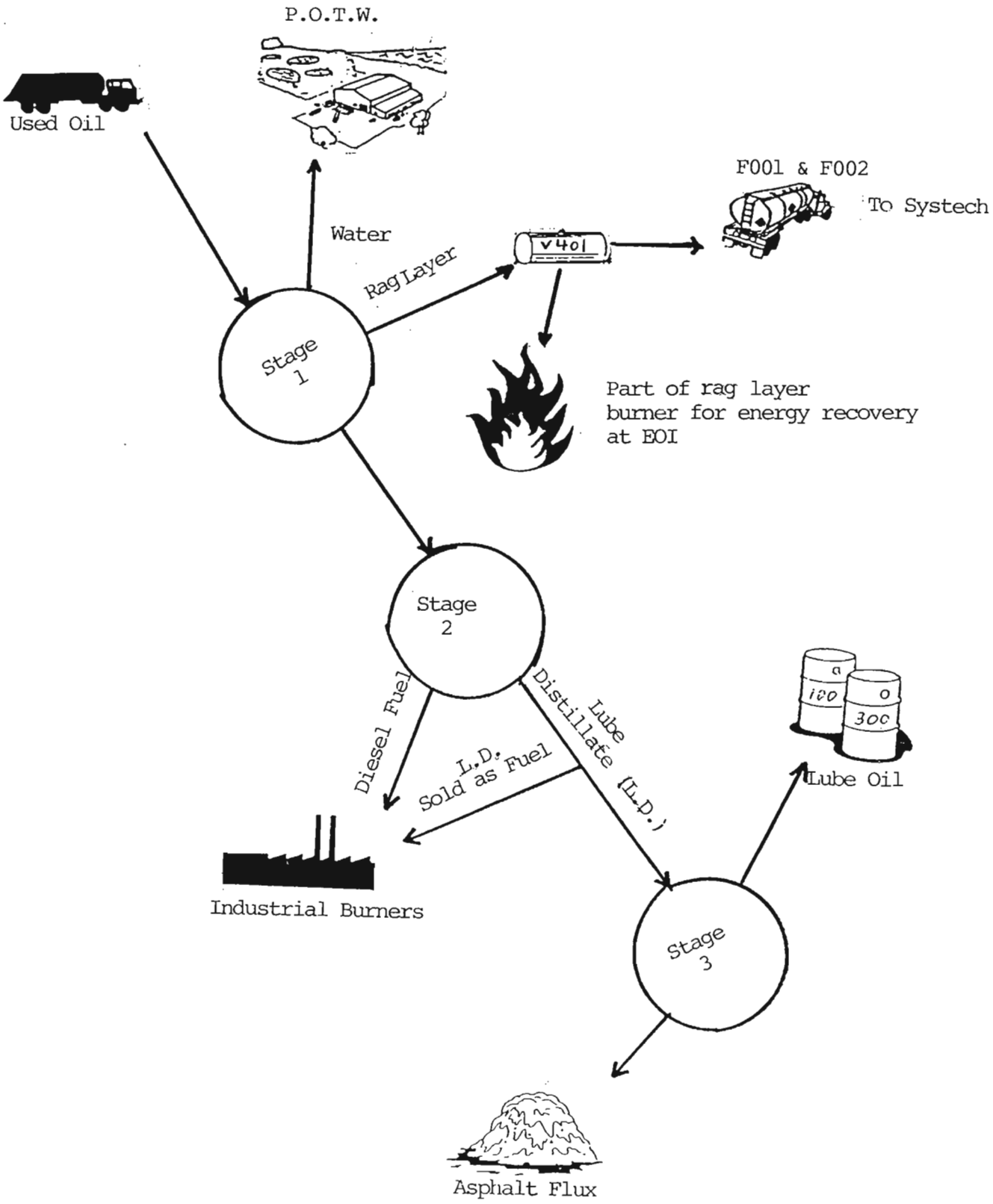
According to California Department of Health Services (Now known as Cal-EPA) records, California issued a non-RCRA hazardous waste facility permit to EOI for a waste oil recycling facility on October 15, 1985. The facility began operating and treating waste oil in 1986.

On October 26, 1986, EOI experienced an explosion of the asphalt flux tank caused by the ignition of flammable vapors by static electricity. On November 18, 1986, EOI submitted a report describing actions taken to correct the problems which may have caused the explosion. Cal-EPA conducted an inspection of EOI on June 24, 1987, that revealed violations of Title 22 of the California Code of Regulations container labeling requirements.(Attachment J) On August 24, 1988, Cal-EPA granted a variance to EOI that permitted the facility to accept waste ethylene glycol in addition to waste oil. A March 21 and 22, 1990, Cal-EPA non-RCRA inspection revealed violations of improper labeling, storing containers open or leaking, and not conducting adequate inspections of waste storage areas. In January, 1991, California granted EOI a variance to allow EOI to increase the facility process rate from 17 to 30 gallons per minute.

During May of 1991, EOI faxed a Part A permit application dated October 9, 1990, to EPA pursuant to the Toxicity Characteristic rule. (Attachment D)

Documents reviewed prior to visiting the facility were the Part A application, the Cal-EPA non RCRA inspection report of the March 21 and 22, 1991, inspection and the October 15, 1985, permit issued by the state. Based on information received during the inspection, EOI did not conduct activities that would become regulated prior to the effective date of the Toxicity Characteristic rule and therefore is not eligible for interim status. EOI is a generator of Hazardous waste only and may not treat or dispose of hazardous waste on site or store hazardous waste on site for greater than ninety (90) days unless it is granted a permit to do so.

EOI PROCESS



(Fig. 1)

INVESTIGATION

EOI's facility consists of one main building which houses the administrative offices and a truck maintenance facility. The process area consists of a truck pumping facility, a large tank farm and the refinery unit. The process area is set on concrete and bermed to prevent spill migration. The South portion of the facility is used for equipment and material storage.

Jane Burns, EOI's Environmental Coordinator, met and escorted the team conducting the inspection. The first half of the day consisted of an inbriefing by inspectors and interviewing Jane Burns, Rick Dunlap, Transportation Manager, and Kirk Hayward, Vice President, about EOI's operations.

Each of EOI's approximately 30 trucks may pick up from as many as 10 generators in one day. In addition, EOI receives used oil from independent haulers. Rick Dunlap estimated that EOI collects 1.2-1.3 million gallons of used oil per month.

Before accepting a load of used oil from a generator, the driver tests the load for total chlorine using the Dexsil CLOR-D-TECT kit (Attachment K) and copper wire test. If the load indicates a level of > 1000 ppm total chlorine, the load is rejected and arrangements are made to pick up the "hot oil" with a separate EOI truck. EOI then transports the rejected oil for disposal. If the load tests < 1000 ppm total chlorine, then it is pumped into the truck and commingled with loads from other stops until the truck is full.

At the refinery, the composite load is retested using CLO-D-TECT and copper wire tests before emptying the truck. If the load tests < 1000 ppm, samples are gathered by EOI's in-house lab to analyze for general properties and determine water, animal fat, residue fuels, and PCB content. The oil is then pumped into a 5000-7000-gallon pre-select tank which holds the oil until the complete lab analysis is obtained. Testing for total metals is conducted on oil held in the pre-select tank only and not from each truck. If the test results are within the facility's operating parameters, then the oil is transferred from the pre-select tank to a feed tank that supplies the refinery operation. If the contaminant constituents are found to be outside the operating parameters, the oil in the pre-select tank is pumped to a bulk tank truck for disposal.

Both Jane Burns and Kirk Hayward stated that on approximately six occasions, used oil that EOI drivers had accepted as having < 1000 ppm total chlorine content was determined by the lab to contain > 1000 ppm but < 2500 ppm total chlorine. These loads were pumped into the pre-select tanks and eventually processed.

The refinery process consists of a series of filtering, mixing, distillation , hydrofinishing and fractioning steps which produces the following EOI products. (See figure 1)

Diesel fuel: sold as a fuel for industrial burners. (Attachment G)

Lube distillate: a fraction from used lube oil that is sold as a fuel to industrial burners and that is further refined to produce two grades of marketable lube oil and an asphalt flux.

100 neutral lube oil: lube oil grade used for transmission fluid.

300 neutral lube oil: lube oil grade valued as hydraulic fluid.

Asphalt flux: the heaviest constituents of lube oil including additives and polymers used in the manufacture of asphalt roofing materials.

In addition to products, a number of wastes are produced by EOI's re-refining process.

Water: Water recovered is discharged to the Union Sanitary District waste water treatment plant.

Rag layer: light constituents of oil containing solvents and other volatile elements of the used oil are captured and collected in a vessel labeled V401. This component is disposed of at Systech and manifested off site as F001 and F002 wastes. Kirk Hayward stated that some of the rag layer is burned for energy recovery at the EOI facility.

Spent aluminum oxide catalyst: spent catalysists are containerized and disposed of at Chemwaste Kettleman Hills facility.(non RCRA)

Process Area Investigation

Inspectors visited the process area escorted by Jane Burns and Curtis Morgan, President of EOI. EOI initially denied EPA's request to take photographs of the facility expressing concerns of trade secrecy. However, EOI did allow EPA to photograph containers of hazardous waste and other specific areas.

The truck pumping facility is situated directly behind the main office building. Here bobtail trucks returning from collection routes pump the oil into the pre-select tanks located in the tank farm. The area consists of a large concrete parking area and several pumping stations.

The tank farm is a large bermed area hold approximately 15 tanks of varying uses. Pre-select tanks holding used oil that has only passed initial analysis and has not yet been designated feed stock for the refinery. Two feed tanks 503A and 503B, hold the used lube oil that supplies the refinery. Other tanks hold process water or finished product including an insulated tank for the asphalt flux product.

The refinery unit is situated directly South of the tank farm. Within this unit is the equipment that separates used oil into reusable products. Also located there is V401, the tank identified by Curtis Morgan as holding the "rag layer" of F001 and F002 wastes.

The process area has been built with storm drains that collect oily rain water and catch the runoff from spill residue from pumping operations. These drains feed into a common sump which has a oil water separator. The oil is recovered and piped back into the feed tanks for processing. The water is discharged in accordance with EOI's publicly owned treatment works permit issued by the Union Sanitary District.(See photos 1 and 2) Drains within the bermed tank farm have been locked out to prevent overwhelming the sump capacity in event of a tank rupture.

The material storage lot is on the south end of the EOI fenced complex. This area holds materials and equipment not currently in use. At the time of the inspection the lot contained several large uninstalled tanks and container boxes of equipment. Poor housekeeping practices were evident and several unmarked open containers of oil and oily debris were observed.(See photos 3, 4, and 5)

Areas Not Inspected

- EOI's laboratory where EOI conducts analyses of samples collected from incoming loads.

- The generator drum storage area described in Cal-EPA's March 1990 report.

POTENTIAL VIOLATION

40 CFR 268.7(a)(6)	EOI failed to maintain copies of Land Disposal Restricted (LDR) waste certification/notification form as required. LDR forms and their accompanying manifests must be maintained for at least 5 years.

#5. Drums of oily waste stored open on EOI's equipment lot.

#3. Oily debris found at the Southwest corner of Evergreen Oil Inc. lot.

#4. Closeup of oily debris at the Southwest corner of EOI lot.

#1. Oil-water sump/separator, oil from small spills on site flow into drains and onto the separator were the oil is recovered and processed. The water waste is discharged into the waste water treatment plant.

#2. Closeup of the oil-water sump/separator.

Attachment B

TREATMENT/STORAGE/DISPOSAL FACILITIES (TSDFs)
RCRA CEI CHECKLIST

SITE ID#: C A D 9 8 0 8 8 7 4 1 8 INSPECTION DATE: 7/11/91

SITE NAME: Evergreen Oil Inc.

LOCATION: 6880 Smith Ave.

Newark CA. 94560

City State Zip Code

LEAD INSPECTOR: Dan Prime OFFICE: H-4-3

Line out parts of the index below not applicable to facility inspected.

INDEX FOR TSD CHECKLIST (40 CFR)

____ ~~Transporter cklist also completed~~

■ Updated to include final and published revisions of 40 CFR through 9/30/90.

Line out items are not appicable To This facility.

Facility Representatives:

Jane Burns (Env. Mgr.)
Kirk D. Hayward (V.P.)
Rick Dunlap (Bobtail mgr.)
Curtis E. Morgan (Pres.)

Other Inspectors:

~~Periann Wood~~
Periann Wood
Patrick Kuefler
Kwiyukwa Madoshi (DHS)

Documents Copied or Requested:

manifests
Training records
costumer lists.

Areas Present / Inspected:

- refinery
- material lot.
- Tank Farm
- Truck pumping Facility

Facility Recipient of Report: Curtis E. Morgan, President
EOI

Mailing Address (if different):
6880 Smith Ave.
Newark, CA. 94560

Generators (Part 261)

	Yes	No	Comments
Does the facility qualify as a conditionally exempt small quantity generator each calendar month by:			
Generating less than 100 kgs, and accumulating less than 1000 kgs of HW on site? 261.5(a),(g) or:	___	✓	
Generating and accumulating less than 1 kg of acute HW, or 100 kgs of acute HW contaminated soil or spill residues? 261.5(e)(1-2)	___	✓	
If NO, proceed to the next page.			
Did the quantity determination include all listed and characteristic wastes generated except: 261.5(d)-			
(1) HW removed from on-site storage?	___	___	NA
(2) HW produced by on-site treatment or reclamation of HW that was already counted once?	___	___	
(3) Spent materials that have already been counted once and that are reclaimed and subsequently reused on site? or:	___	___	
HW exempted from regulation? 261.5(c)	___	___	
Does the facility generate HW?	___	___	
Has the generator of solid wastes made a HW determination by determining if the waste is: (262.11)			
(a) Excluded from regulation under 261.4?	___	___	
(b) Listed as a HW in 261 Subpart D?	___	___	
■(c) For purposes of compliance with Part 268, or if the waste is not listed in Part 261, Subpart D, has the generator determined if the waste exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	___	___	
(2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used?	___	___	
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?	___	___	

■ [NOTE: Disposal of the following PCB wastes & materials are exempt from 40 CFR Parts 261 thru 265 & notifications of Section 3010 of RCRA: (261.8)
■ (1) PCB-containing dielectric fluid and electric equipment containing such fluid authorized for use and regulated under Part 761 of 40 CFR; and that
■ (2) Are HW only because of toxicity characteristics (Codes D018 through D043)

GENERATORS
(ALL except Conditionally Exempt)
(Part 262)

	Yes	No	Comments
Has the generator submitted a Notification of Hazardous Waste Activity (EPA Form 8700-12) and obtained an EPA ID number before handling HW? 262.12(a)	✓		
Have they offered HW only to transporters or TSDs with an EPA ID#? 262.12(c)	✓		
HW Generation Points The generator may accumulate HW at or near the point of initial generation without meeting storage deadlines provided: 262.34(c)(1)			
They have accumulated no more than 55 gallons of HW or one quart of acute HW? and:			NA accumulation areas not inspected.
The area is under the control of the operator of the process generating the waste? and:			
(i) The container is in good condition, compatible with the waste, and kept closed (except when HW is being removed or added)?			
(ii) The container is marked with the words "Hazardous Waste" or other words that identify the contents?			
When HW accumulates in excess of the above amounts, does the generator: 263.34(c)(2)-			
Continue to comply with the storage requirements above? and:			
Mark the container holding the excess with the date the excess amount of HW began accumulating? and:			

	Yes	No	Comments
Comply with all 90-day storage requirements within three days? (262.34(a)	___	___	NA

Generators of Between 100 and 1000 kg/month
(Part 262)

	Yes	No	Comments
100-1000 kgs/mo. Generator Qualifications			
Does the facility generate between 100 and 1000 kilograms of non-acute* HW per month, and never accumulate more than 6000 kilograms of HW on site?	___	___	NA
If NO, go to fully regulated generators.			
Has the 100-1000 kg/mo. generator accumulated HW on site for no more than 180 days** without a permit or interim status? 262.34(d)	___	___	
Have they accumulated less than 6000 kgs of HW on site at any time? 262.34(d)(1)	___	___	
If the generator exceeded the applicable storage time or quantity limit without an EPA extension, did they comply with all TSD storage facility regulations? 262.34(f)	___	___	
Did the 100-1000 kg/mo. generator that treats, stores, or disposes of HW on-site submit a Part A application by 3/24/87? 270.10(e)(iii)	___	___	
While accumulating waste, has the 100-1000 kg/mo. generator complied with the requirements for storage in containers, 265 Subpart I (except for the 50 foot rule (265.176))? 262.34(d)(2)	___	___	
Has the 100-1000 kg/mo. generator complied with the requirements for: 262.34(d)(4)			
265 Subpart C, preparedness and prevention? and:	___	___	
Clearly marked the date accumulation started on each container? and:	___	___	
Labelled each container and tank with the words "Hazardous Waste"?	___	___	

*Generators of more than 1 kg/mo., or who accumulate more than 1 kg at any time, of acute HW (listed in 261.33(e) are fully-regulated generators. [261.5(f)(2), revised 7/19/88].

**270 days if transported more than 200 miles to TSD facility. 262.34(e).

Continued: Generators of Between 100 and 1000 kg/mo (Part 262)

	Yes	No	Comments
Does the generator have an EMERGENCY COORDINATOR (EC) on site or immediately available at all times? 262.34(d)(5)(i)	___	___	NA
Is the following information posted next to the telephone: 262.34(d)(5)(ii)-			
(A) EC's name and phone number?	___	___	
(B) Location of fire extinguishers, spill control material, and any fire alarms?	___	___	
(C) If no direct alarms, the phone number of the fire department?	___	___	
Are all employees familiar with their jobs, proper waste handling, and emergency procedures? 262.34(d)(5)(iii)	___	___	
If an emergency has occurred, has the emergency coordinator: 262.34(d)(5)(iv)-			
(A) Tried to extinguish the fire, or called the fire department?	___	___	
(B) In the event of a spill, contained the flow of HW, and cleaned up as soon as possible?	___	___	
(C) Determined if the emergency is threatening human health or surface water outside the facility, and if so called the National Response Center at (800) 424-8802 and reported:			
(1) The generator's name, address, and EPA ID#?	___	___	
(2) Date, time, and type of incident?	___	___	
(3) Quantity and type of HW involved?	___	___	
(4) Extent of any injuries?	___	___	
(5) Estimated quantity and disposition of any recovered materials?	___	___	

	Yes	No	Comments
Did generator keep copies of signed manifests, waste analysis, test results, or HW determinations for 3 yrs. after the waste was last sent for on/off-site treatment, storage, or disposal? 262.44(a)	___	___	
Is the 100-1000 kg/mo. generator's HW reclaimed under a contractual agreement? 262.20(e)- If yes:	___	___	
(i) Does the waste reclamation contract specify the type of waste and frequency of shipments?	___	___	
(ii) Is the transport vehicle owned and operated by the recycler/ reclaimer?	___	___	
(2) Did the generator keep a copy of the contractual agreement for 3 years after the agreement ended?	___	___	
If not reclaimed under contract, complete below and "Manifests" below.			
Did the 100-1000 kg/mo. generator who has not received a signed copy of the manifest from the TSD within 60 days submit a copy of the manifest to the RA with a note indicating they have not received confirmation of delivery? 262.42(b), 262.44(b)	___	___	

MANIFESTS: 262.20-

(a) Does the generator prepare a complete manifest according to the instructions (see Part 262 Appendix) before transporting HW off-site?	✓	___	
(b) Does the generator designate on the manifest one facility which is permitted to handle the HW?	✓	___	
(c) Has the facility designated an emergency alternate facility? or:	✓	___	
(d) Instructed the transporter to return the waste to the generator in the event an emergency prevents delivery?	✓	___	

	Yes	No	Comments
Did the generator use the supplied manifest required by a consignment State: 262.21-			
(a) Where the receiving facility is located? or, if not provided by that state:	___	___	NA
(b) Where the generating facility is located?	___	___	
(c) If not provided by either state, the EPA form from another source?	___	___	
Did the manifest consist of enough copies? 262.22	✓	___	
Did the generator: 262.23(a) (1) Sign the manifest by hand?	✓	___	
(2) Obtain the signature of initial transporter and date of acceptance on manifest?	✓	___	
(3) Keep one copy of the manifest (per 262.40(a))?	✓	___	
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)	✓	___	
If the SHIPMENT WAS SENT BY WATER or rail, did the generator send at least 3 copies of the manifest to the designated facilities? 262.23(c), -(d)	✓	___	
■ For hazardous waste shipments to a facility in an authorized state which is not yet authorized to regulate that waste as hazardous, has the generator: 262.23(e)			
1) Confirmed that the facility receiving the waste agrees to sign and return the manifest to the generator? and;	___	___	NA
2) Confirmed that any out-of-state transporter signs and forwards the manifest to the designated facility?	___	___	NA

PRE-TRANSPORT REQUIREMENTS: Part 262, Subpart C

	Yes	No	Comments
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30			Not Inspected
Are waste packages labeled in accordance with DOT regulations (49 CFR 172.101)? 262.31			↓
and; 262.32 (a) including:			
Proper shipping name [table column 2]?			
Proper ID number [table column 3A]?			
Proper ORM designation for containers of ORM-A,B,C,D, or E wastes?			
Are containers of 110 gallons or less marked with the following words: 262.32(b)			
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.			
Generators Name & Address ________			
Manifest Document Number ________			
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33			

90-DAY STORAGE 262.34

	Yes	No	Comments
If the generator does not have interim status (as TSD storage facility), have they accumulated HW on-site for less than 90 days? 262.34(a)	✓		
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	✓		Inspectors observed few containers GAL HW but did observe a number of containers of unknown HW on the SW section of EOJ lot, (oil waste),
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)	✓		pressure vessel 401 is a tank which received the hazardous [illegible] ends of the process. This tank was not marked with the words HW

Interim Status:
(Part 270 Subpart G)

For existing HWM facility to be treated as having been issued a permit, has the facility:	Yes	No	Comments
Obtained an EPA ID # by submitting a Notification of Hazardous Waste Activity?* and/or: 265.11, 270.70(a)(1)	✓		
Submitted a Part A permit application?** 270.70(a)(1)	✓		yes but late Noticafied under TC rule 9 days late to State & EPA did not receive Part A until May 91.
Completed the Part A per 270.13? 270.70(b)	✓		
■If the facility handles toxicity characteristic waste(s), was an amended Part A submitted by 9/25/90?	✓		
Never been denied a RCRA permit or interim status? 270.70(c)	✓		
Has the facility complied with the following restrictions while operating under interim status: 270.71(a)-	✓		
Has only treated, stored or disposed of HW specified in the Part A?	✓		
(2) Has only employed processes specified in the Part A?	✓		
(3) Has not exceeded design capacities specified in the Part A?	✓		
Has a revised Part A been submitted prior to the following changes: 270.72-			
(a) T/S/D of HW not previously identified in the Part A?	✓		
(b) Increases in design capacity of processes?	✓		
(c) Changes in or additions to processes?	✓		
(d) 90 days prior to change in ownership?	✓		
(e) Have the changes made not amounted to reconstruction?*	✓		

*Also see Part 266 Subparts D (HW Fuel Burning) and E (Used Oil Burning if applicable.

**Earliest applicable of: 11/19/80, 6 months after new reg's published, 30 days after they first become subject to reg's. (270.10(e)(i), -(iii)(3)).

	Yes	No	Comments
Termination of interim status:			
Did the facility submit a requested Part B in full, and on time? 270.10(e)(5), 270.73(b)	✓		
For land disposal facilities granted interim status prior to 11/8/84, did the facility submit before 11/8/85: 270.73(c)-			
(1) Part B of permit application?			NA
(2) Certification of compliance with applicable ground water monitoring & financial responsibility requirements?			
For land disposal facilities granted interim status after 11/8/84, did the facility submit within 12 months: 270.73(d)-***			
(1) Part B of the permit application?			
(2) Certification of compliance with all GW monitoring and financial responsibility requirements?			
For incinerator facilities, did the facility submit a Part B before 11/8/86? 270.73(e)			
For all other facilities, was a Part B submitted before 11/8/88**? 270.73(f)			✓

See also applicable interim-status requirements for surface impoundments (265.221(b) and landfills (265.301(b).

* >50% of the cost of an entirely new facility, except for changes made solely for complying with new regulations for tanks (265.193) and/or Land Disposal Restrictions (268).

** If no, interim status will terminate on 11/8/92.

*** Land disposal facilities newly regulated under the Toxicity Characteristics rule, must comply with groundwater monitoring requirements by 9/25/91.

General Facility Standards:
(Part 265 Subpart B)

Required Notices:	Yes	No	Comments
Has the RA been notified at least 4 weeks prior to the receipt of HW from a foreign source? 265.12(a) (see also Generators, 262 Subpart F.)	___	___	NA
Before transferring ownership or operation, has the facility notified the new owners/operators in writing of the requirements of Parts 265 and 270? 265.12(b)	___	___	
If a permit has been transferred to a new owner/operator, was the permit modified or revoked and reissued to identify the new permittee? 270.40	___	___	

General Waste Analysis:

■ Has the facility obtained a detailed chemical and physical analysis that contains all information that must be known to properly treat, store or dispose of each HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	___	___	NOT reviewed since an amended WAP is under review By Permiting, Did Look at old plan, no problems were observed.
■ Did the facility perform the analysis before treating, storing or disposing of any HW or non-hazardous wastes applicable under 265.113(d)? 265.13(a)(1)	___	___	
Does the facility have records documenting the required HW analysis, e.g., lab reports, published data, generator supplied data as developed under Part 261? 265.13(a)(2)	___	___	
Has the analysis been repeated to ensure that it is accurate and up-to-date? 265.13(a)(3)	___	___	
■ After 9/25/90, was the TCLP test used when applicable?	___	___	
Is the analysis repeated when there is a change in the generating process? 265.13(a)(3)(i)	___	___	

Subpart B-General Facility Standards

	Yes	No	Comments
For off-site facilities, is the analysis repeated when the HW received does not match the HW designated on the manifest? 265.13(a)(3)(ii)			
For off-site facilities, does the facility inspect or analyze each movement of HW to verify that the HW received matches the identity of the HW specified on the manifest? 265.13(a)(4)			
Has the facility developed and followed a written waste analysis plan, and is the plan kept at the facility? 265.13(b)	✓		New Waste analysis Plan is under review at DHS as part of permit application.
Does the waste analysis plan contain the following elements: 265.13(b)-			
(1) Parameters of analysis of each HW handled and the rationale for the selection of these parameters?			
■ (2) The methods which will be used to test for these parameters, including method 1311 (found in SW-846 or 40 CFR Part 261, Appendix II) if the facility handles Toxicity Characteristic waste(s)? 261.24			
(3) Sampling method used to obtain a representative sample of each HW?			
(4) Frequency with which the initial analysis will be reviewed or repeated?			
(5) For off-site facilities, the analysis that generators have agreed to supply?			
(6) The methods which will be used to meet the additional analysis requirements for:			
Tanks?(265.198-200)			
Surface Impoundments?(265.225, & p.K2)			
Waste Piles?(265.252)			
Land Treatment?(265.273)			
Liquids in landfills?(265.314)			
Incinerators?(265.341)			
Thermal Treatment?(265.375)			
Other Treatment?(265.402)			
Land Disposal Restrictions?(268.7)			

■ Complete applicable checklist on each unit. See Index for Page No.

General- Waste Analysis Plan For off-site facilities, does the p[illegible] contain: [265.13(c)]	Yes	No	Comments
(1) Description of procedures used to identify each movement of HW?	___	___	
(2) Description of the sampling method used to obtain a representative sample of the HW?	___	___	
Unless exempt under 265.14(a)(physical contact or disturbance of the waste and unit will not cause harm), do SECURITY MEASURES include:			
A 24-hour surveillance system? 265.14(b)(1) or:	___	___	
Artificial or natural barriers that completely enclose the facility? 265.14(b)(2)(i) and:	___	___	
Means to control entry onto the active portions of the facility at all times? 265.14(b)(2)(ii)	___	___	
A[illegible] signs with the legend "Danger- Unauthorized Personnel Keep Out" or equivalent posted that are: 265.14(c)-			
At each entrance and any other approach to active portions of the facility?	___	___	
Legible from at least 25 feet away?	___	___	
Written in English and any other language predominant in the surrounding area?	___	___	
General Inspection Requirements:			
Does the facility inspect for malfunctions, deterioration, operator errors, and HW discharges often enough to correct problems before they cause harm? 265.15(b)(1)	✓	___	
Does the facility follow a written inspection schedule? 265.15(a)	✓	___	
I[illegible]he schedule kept at this facility? 26[illegible].15(b)(2)	✓	___	

Cont'd., Fac. Inspec. Requirements	Yes	No	Comments
Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: 265.15(b)(3)-			
Monitoring equipment?	✓		
Safety, emergency equipment?	✓		
Security devices?	✓		
Operating and structural equipment?	✓		
Does the schedule include: 265.15(b)(4)-			
The frequency of inspection for each item?	✓		
Daily inspections for loading and unloading areas?	✓		
The inspection frequencies required for each unit?	✓		
Has the facility taken immediate remedial action to correct hazards revealed on an inspection? 265.15(c)	✓		
Are inspections recorded in an inspection log? Does the log include: 265.15(d)	✓		
Date and time of inspection?	✓		
Name of inspector?	✓		
Observations noted?	✓		
Date and nature of repairs or other remedial actions?	✓		
Are inspection records kept for at least 3 years? 265.15(d), 265.73(b)(5)	✓		
PERSONNEL TRAINING - 265.16			
Does the facility have a HW personnel training program? 265.16(a)(1)	✓		
Is it directed by a person trained in HW management procedures? 265.16(a)(2)	✓		
Does the program include training in emergency procedures including contingency plan implementation? 265.16(a)(3)- and:	✓		
(i) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment?	✓		
(ii) Key parameters for automatic waste feed cut-off systems?	✓		

Cont'd., Pers. Train.	Yes	No	Comments
(iii) Communication or alarm systems?	✓		
(iv) Response to fire or explosions?	✓		
(v) Response to ground water contamination incidents?	✓		
(vi) Emergency shutdown of operations?	✓		
Are new personnel supervised until training is completed? 265.16(b)	✓		
Do new personnel complete the training within 6 months? 265.16(b)	✓		
Do personnel take part in an annual review of the initial training? 265.16(c)	✓		
Do personnel training records include for each HW position: 265.16(d)-			
(1) Job title and name of person filling the position?	✓		
(2) Job Description?	✓		
Description of required HW training?	✓		
(4) Documentation that HW training orjob experience required has been completed?	✓		
Are training records kept for current employees until closure, and past employees for at least 3 years? 265.16(e)	✓		

REQUIREMENTS for IGNITABLE, REACTIVE, or INCOMPATIBLE WASTES: (265.17)

Are precautions taken to prevent accidental ignition or reaction, including: 265.17(a)-			
Separation and protection from ignition sources?	✓		
No smoking signs in hazard areas?	✓		

	Yes	No	Comments
Is the T/S/D of ignitable, reactive or incompatible waste conducted so that it does not: 265.17(b)-			
(1) Generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
(2-3) Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	✓		
(4) Damage structural integrity of HW containment devices?	✓		
(5) Otherwise threaten human health or the environment?	✓		

PREPAREDNESS AND PREVENTION
(Part 265 Subpart C)

Location Standards:			
The facility did not place HW in a salt dome, salt bed formation, underground mine or cave? (265.18)	✓		
Is the facility maintained and operated to minimize the possibility of fire, explosion, or releases of HW or HW constituents to air, soil, surface water which could threaten human health or the environment? 265.31	✓		
Does the facility have the following equipment where applicable: 265.32-			
(a) Internal communications or alarm system capable of providing immediate emergency instruction?	✓		
(b) Telephone or 2-way radios at the scene of operation?	✓		
(c) Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment?	✓		
(d) Water at adequate volume and pressure, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		

Cont'd., Prevention	Yes	No	Comments
Does the facility test and maintain all emergency equipment in operable condition? 265.33	✓		
Do personnel in areas where HW is being handled have immediate access to internal alarm or communication systems, or voice or visual contact with another employee? 265.34(a)	✓		
Can personnel that operate the facility while alone immediately access external emergency assistance? 265.34(b)	✓		
Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency? 265.35	✓		

Arrangements With Local Authorities:

Has the facility attempted to make the following arrangements/agreements:			
Familiarize police, fire dept., and emergency response teams with HW operations? 265.37(a)(1)	✓		
Designate primary emergency authority? 265.37(a)(2)	✓		
With state emergency response team, contractors and equipment suppliers? 265.37(a)(3)	✓		
Familiarize local hospitals with the properties of HW and the types of potential injuries and illnesses from exposure to HW? 265.37(a)(4)	✓		
Did the facility document in the operating record any refusal by state or local authorities to enter into such arrangements? 265.37(b)	✓		

CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

	Yes	No	Comments
Does the facility have a contingency plan designed to minimize hazards from fires, explosions, or any unplanned releases of HW or HW constituents? 265.51(a)	✓		
Does the plan describe actions staff must take to comply with 265.51 and 265.56 responses? 265.52(a)	✓		
Does the plan describe the arrangements agreed to in 265.37? 265.52(c)	✓		
Does the plan list the current names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators? 265.52(d)	✓		up dated recently
Does the plan name one person as primary emergency coordinator and list any others in order of responsibility? 265.52(d)	✓		
Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability? 265.52(e)	✓		
Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes? 265.52(f)	✓		
Is the plan maintained at the facility? 265.53(a)	✓		
Has the plan been submitted to all local emergency organizations that may be called upon in responses? 265.53(b)	✓		
Has the plan been reviewed and immediately amended whenever: 265.54-			
(a) Applicable regulations are revised?	✓		
(b) The plan fails in an emergency?	✓		
(c) Facility changes required it?	✓		

Contingency Plan Cont'd: 265.54	Yes	No	Comments
(d) The list of emergency coordinators changes?	✓		
(e) The list of emergency equipment changes?	✓		
Is there at all times at least one employee at the facility, or close by and on call, designated as emergency coordinator? 265.55	✓		
Is this coordinator thoroughly familiar with all aspects of site operations, including locations and characteristics of waste handled, the locations of records, the facility layout, and emergency procedures? 265.55	✓		
Does the coordinator have authority to commit the resources to carry out the contingency plan? 265.55	✓		
If an emergency situation has occurred at this facility, did the emergency coordinator (EC) immediately:			
Activate alarm systems? 265.56(a)(1)	✓		
Notify the appropriate response agencies? 265.56(a)(2)	✓		
Identify the character, exact source and amount, and real extent of any released materials? 265.56(b)	✓		
Assess the possible direct and indirect hazards from the release, including gases and run-off of fire fighting materials? 265.56(c)	✓		
If assessment indicates the release could threaten harm outside the facility, does the EC:			
Report his findings to appropriate authorities if it may be advisable to evacuate the local area, and remain on call to help the authorities decide? 265.56(d)(1)	✓		

Con't., Contingency Plan-Reporting

	Yes	No	Comments
Immediately notify either the government on-scene coordinator or the National Response Center's toll-free line at 800/424-8802? 265.56(d)(2)	✓		
Did the report include: 265.56(d)(2)-			
(i) The name and phone # of the reporter?	✓		
(ii) Name and address of the facility?	✓		
(iii) Time and type of incident?	✓		
(iv) Name and quantity of materials involved to the extent known?	✓		
(v) The extent of any injuries?	✓		
(vi) The possible hazards to the outside area?	✓		
During the emergency, does the E.C. take all reasonable measures to minimize the release? 265.56(e)	✓		
If the facility had to stop operations to respond, does the E.C. monitor all appropriate equipment? 265.56(f)	✓		
After the emergency, does the EC immediately provide for the TSD of recovered or contaminated material resulting from the release? 265.56(g)	✓		
Does the EC ensure that in the affected areas of the facility: 265.56(h)-			
(1) Wastes incompatible with the released material are not handled until after clean-up is complete?	✓		
(2) All emergency equipment is clean and fit for use before operations resume?	✓		
Does the facility notify the RA, state and local authorities that the above has been done before resuming operations in affected areas? 265.56(i)	✓		

	Yes	No	Comments
If the contingency plan has been implemented:			
Did the operating record include the date, time, any details of each incident that required implementation of the contingency plan? 265.56(j)	___	___	NA
Within 15 days after the incident, did the facility submit a written report to the Regional Administrator? 265.56(j) and 265.77(a)	___	___	
Did the report include: 265.56(j)-			
(1) Name, address and phone # of the owner or operator?	___	___	
(2) Name, address, and phone # of the facility?	___	___	
(3) Date, time, and type of incident?	___	___	
(4) Name and quantity of materials involved?	___	___	
(5) The extent of any injuries?	___	___	
(6) A hazard assessment?	___	___	
(7) An estimate of the quantity and disposition of recovered material?	___	___	

MANIFEST SYSTEM, RECORD KEEPING, and REPORTING:
(Part 265 Subpart E)

	Yes	No	Comments
Manifest System:			
If the facility receives HW from an off-site source, do they comply with the following manifest requirements:			
(1) Sign and date each copy of the manifest? 265.71(a)(1)	✓	___	
(2) Note any significant* discrepancies in the manifest? 265.71(a)(2)	✓	___	
(3) Give transporter one copy of the signed manifest? 265.71(a)(3)	✓	___	

	Yes	No	Comments
(4) Within 30 days after delivery, send a copy of the manifest to the generator? 265.71(a)(4)	✓		
Are records of past shipments retained for 3 years? 265.71(a)(5)	✓		

Manifest Discrepancies:

Upon discovering a significant discrepancy,* has the facility made an attempt to reconcile with the generator or transporter? 265.72(b)	✓		
For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures? 265.72(b)			N/A

* Significant discrepancies are:
1. For bulk waste; variations > 10% in weight.
2. For containerized waste; variations > one drum.
3. Obvious differences such as waste solvent substituted for waste acid, or toxic constituents not reported on the manifest.

Unmanifested Waste Report:	Yes	No	Comments
For a facility that has accepted HW from an off-site source without an accompanying manifest, and the generator was not a conditionally exempt small quantity generator (261.5), was a report containing the required information submitted to the RA within 15 days after receiving the HW? 265.76(a-g)			N/A

Operating Record:

Does the facility maintain an operating record? 265.73(a)	✓		
Does the operating record contain the following information:			
A description and the quantity of each waste received as required by Appendix I? 265.73(b)(1)	✓		
The method(s) and date(s) of its treatments, storage or disposal as required by Appendix I? 265.73(b)(1)	✓		

Cont'd., Operating Record	Yes	No	Comments
The location of each waste within the facility and the quantity at each location? 265.73(b)(2)	___	___	NA
For disposal facilities, the location and quantity of each waste recorded on a map or diagram of each cell or disposal area? 265.73(b)(2)	___	___	NA
For all facilities, is the location and quantity information cross-referenced to specific manifest numbers? 265.73(b)(2)	___	___	NA
Records the results of all waste analyses and trial tests? 265.73(b)(3)	___	___	
Reports detailing all incidents that required implementation of the contingency plan? 265.73(b)(4)	___	___	
Records the results of inspections for the last three years? 265.73(b)(5)	___	___	
Monitoring, testing, and analytical data? 265.73(b)(6)	___	___	
All closure and post-closure costs as applicable? 265.73(b)(7)	___	___	
Records of the quantities (and date of placement) for each shipment of hazardous waste placed in land disposal units <u>when granted a Part 268 case-by-case extension</u>, monitoring data required by a successful petition, certifications under 268.8 (1st and 2nd third soft hammer), and all applicable generator notices? 265.73(b)(8)	___	___	NA
Is a copy of each notice, and any applicable certification and demonstration, required of the generator under Part 268 retained for each shipment of wastes received from off-site for: 265.73(b)-			
(9) Treatment?	___	___	NA
(11) Disposal?	___	___	NA
(12) Storage?	___	___	NA

	Yes	No	Comments
Is all information required of a generator under Part 268 including notices (except for the manifest number), and any applicable certification and demonstration, on file where the facility is further handling restricted wastes generated on-site by: 265.73(b)-			
(10) Treating?	___	___	NA
(12) Disposing?	___	___	NA
(14) Storing?	___	___	A

AVAILABILITY, RETENTION, DISPOSITION OF RECORDS:

Are all records, including plans, available for inspection? 265.74(a)	✓	___	
Has the facility submitted a biennial report to the RA by March 1 of each even numbered year? 265.75	✓	___	
Was the report submitted on EPA form 8700-13B? 265.75	✓	___	
Did the report cover facility activities during the previous calendar year? 265.75	✓	___	Report was signed 4/14/90 ~~a month~~ PK 45 Days after the report was due
Does the report include the following information: 265.75-			
(a) EPA identification number, name and address of the facility?	✓	___	
(b) Calendar year covered by report?	✓	___	
(c) For off-site facilities, the EPA ID number of each HW generator?	✓	___	
(d) A description of and quantity of each type of HW received and, for off-site facilities, the EPA ID number of each generator listed with this information?	✓	___	
(e) Methods of treatment, storage, or disposal for each type of HW?	✓	___	

Cont'd., Recordkeeping, 265:E	Yes	No	Comments
(f) Ground water monitoring data under 265.94(a)(2)(ii-iii) and (b)(2)?	___	___	NA
(g) Most recent closure and post-closure cost estimates?	✓	___	
(h) Signed certification?	✓	___	

GROUND WATER MONITORING:
(Part 265 Subpart F)

	Yes	No	Comments
If the facility operates a HW surface impoundment, landfill, or land treatment unit*, has a ground water monitoring program consisting of at least one upgradient and 3 downgradient wells been implemented (and certified under 270.73)? 265.90(a)	___	___	NA
If NO, is a written waiver demonstration, certified by a qualified geologist or geotechnical engineer, kept at the site? 256.90(c)	___	___	
Date of last CME or O&M: ___/___/___			EPA? ____ State? ____
Is a ground water sampling and analysis plan kept at the facility? 265.92(a)	___	___	
Does it include procedures and techniques for: 265.92(a)-			
(1) Sample collection?	___	___	
(2) Sample preservation and shipment?	___	___	
(3) Analytical procedures?	___	___	
(4) Chain of custody control?	___	___	
Has an outline of a ground water quality assessment program been prepared? 265.93(a)	___	___	
Have records been kept of: 265.94(a)(1)			
Analysis for all parameters (see next page) quarterly for the first year as required by 265.92(c)	___	___	
Ground water quality analysis annually since the first year as required by 265.92(d)(1)?	___	___	

	Yes	No	Comments
Ground water contamination indicators at least semi-annually since the first y[illegible] as required by 265.92(d)(2)?	___	___	_____
Ground water surface elevations taken during each sampling of each well as required by 265.92(e)	___	___	_____

*Including units that are inactive but not certified as clean closed.

-

Did the owner or operator record ground water analytical data as measured and in a form necessary for the determination of statistical significance for the compliance period of the facility? 265.99	___	___	_____
The Student's T-test calculations (at the 0.01 level of significance) for comparison of ground water contamination indicators over initial background as required in 265.93(b)?	___	___	_____

If the facility found comparisons for downgradient wells made under 265.93(b) showed a significant increase (or pH decrease) over background levels, proceed to "Facility Affecting GW Quality."

H[illegible] the following been submitted to the RA ?: See 265.77(b), 265.94(a)(2)

During the first year, the initial background concentrations of parameters listed in 265.92(b) within 15 days after completing each quarterly analysis? 265.94(a)(2)(i)	___	___	_____
For each well, were any parameters whose concentrations or values exceeded the maximum contaminant levels allowed in drinking water supplies (Appendix III) separately identified? 265.94(a)(2)(i)	___	___	_____

Annual reports by each March 1 including:

Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b)? 265.94(2)(ii)	___	___	_____

See EPA interim primary drinking water standards (265.92(b)(1)): Arsenic, Barium, Cadmium, Chromium, Fluoride, Lead, Mercury, Nitrate (as N), Selenium, Silver, Endrin, Lindane, Methoxychlor, Toxaphene, 2-[illegible] D, 2,4,5-TP Silver, Radium, Gross Alpha, Gross Beta, Turbidity (surface w[illegible]r), Coliform Bacteria.

See parameters establishing ground water quality (265.92(b)(2)): Chloride, Iron, Manganese, Phenols, Sodium, Sulfate.
Parameters used as indicators of ground water contamination 265.92(b)(3)): pH, Specific Conductance, Total Organic Carbon, Total Organic Halogen.

GW-Cont'd.	Yes	No	Comments
Separate identification of any significant differences from initial background found in the upgradient wells? 265.94(2)(ii)	___	___	
Results of the previous year's evaluation of ground water elevations, and a description of any applicable response? 265.94(2)(iii)	___	___	
<u>Reporting by facilities that may be affecting ground water quality: 265.77(b), 265.93(d)</u>			
If the facility confirmed the determination that they may be affecting ground water quality was not made in error (265.93(c)(2)), was a written notice sent to the RA within 7 days of confirmation? 265.93(d)(1)	___	___	
Within 15 days of notification to the RA was a certified ground water quality assessment plan submitted? 265.93(d)(2)	___	___	
After implementation of this plan, did the facility determine if HW or HW constituents from the facility have entered the ground water? 265.93(d)(4)	___	___	
Within 15 days after the determination was a written report containing the assessment of ground water quality submitted to the RA? 265.93(d)(5)	___	___	
If HW or HW constituents have been determined to have entered the ground water, are determinations of HW or HW constituents continued on a quarterly basis until final closure of the facility*? 265.93(d)(7)	___	___	

*If the program was implemented during the post-closure care period, determinations made in accordance with the ground water quality assessment pl may cease after the first determination per 265.93(d)(7)(ii).

Cont'd., GW Monitoring

	Yes	No	Comments
If HW or HW constituents have been determined to have entered the ground water, did the owner or operator institute a corrective action program under 265.10? 264.91	___	___	
If no HW or HW constituents were shown to have entered to ground water, was the RA informed of the determination if the indicator evaluation program only was reinstated? 265.93(d)(6) [Defined in 265.92 and 265.93(b).]	___	___	
Were records kept of the analysis and evaluations specified in the ground water quality assessment throughout the life of the facility? 265.94(b)(1)	___	___	
If a disposal facility, were (are) records kept throughout the post-closure period as well? 265.94(b)(1)	___	___	
Are annual reports submitted by March 1 to the RA containing the results of the ground water quality assessment program? 265.94(b)(2)	___	___	
Do the reports include the calculated or measured rate of migration of HW or HW constituents during the reporting period? 265.94(b)(2)	___	___	

CLOSURE and POST-CLOSURE
(Part 265 Subpart G)

	Yes	No	Comments
Does the facility have a closure plan 265.112(a) ?	✓	___	Date: Currently being reviewed as part of part B application at DHS. Not Looked at in this investigation.
If the plan has not been approved by the EPA, was a copy available on the day of inspection? 265.112(a)	___	___	NA
Does the plan identify for the active life of the facility:			
The steps necessary to completely or partially close the facility at any point? 265.112(b)	___	___	
How each Hazardous Waste management unit will be closed? 265.112(b)(2)	___	___	

	Yes	No	Comments
If the guarantor or financial institution is incapacitated, has the facility owner/operator established other financial assurance or liability coverage within 60 days? 265.148(b)	___	___	NA

USE and MANAGEMENT of CONTAINERS:
(Part 265 Subpart I)

	Yes	No	Comments
Does the facility transfer HW from containers not in good condition or leaking to containers in good condition? 265.171	___	___	Did not look at small containment accumulation area on this inspection, Non RCRA oil containers were observed with Cal-EPA violations.
Are containers compatible with the HW stored in them? 265.172	___	___	
Are containers stored closed? 265.173(a)	___	___	
Are containers managed to prevent rupture or leakage? 265.173(b)	___	___	
Are containers inspected weekly for leaks and deterioration? 265.174	___	___	
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	___	___	
Are incompatible wastes stored in separate containers? 265.177(a)	___	___	
Is HW not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	___	___	
Are containers holding HW that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)	___	___	

Cont'd., CONTAINERS, 265:I

	Yes	No	Comments
Are containers or inner liners that are not empty managed as HW? 261.7(a)(2)	___	___	
For a container to be considered empty, the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	___	___	
(ii) One inch of residue on bottom of container or inner lining? or:	___	___	
(iii)(A) If the container is not over 110 gallons in size, 3% of weight when full?	___	___	
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? or:	___	___	
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	___	___	
If a container (or liner removed from the container) has held an acute HW, it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	___	___	
(ii) Cleaned by another proven removal means? or:	___	___	
(iii) For the container, the liner prevented contact and has since been removed?	___	___	

See also 40 CFR 265.31.

*TSDs that generate HW also must comply with 262 regs. An Accumulation Areas checklist follows on pages 43A, 43B, and 43C.

Tanks:
(Part 265 Subpart J)

If a 100-1000 kg/mo. generator that accumulates in tanks, see Page 54.

	Yes	No	Comments
Are tanks used to store or treat HW exempt from this subpart because they contain no free liquids and are situated inside a building with an impermeable floor? 265.190(a)	✓		
Are tanks exempt from this subpart because they serve only as part of a secondary containment system? 265.190(b)	✓		
Are HW or treatment reagents placed in tanks so that they do not cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail? 265.194(a)	✓		
Are controls and practices used to prevent spillage, including: 265.194(b)-			
(1) Spill prevention controls e.g., check valves, dry discount couplings?	✓		
(2) Overfill prevention devices e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?	✓		
(3) Sufficient freeboard in uncovered tanks to prevent overtopping by wind action, wave, or precipitation?			N/A
Are daily inspections done for the following: 265.195(a)-			
(1) Discharge control equipment e.g., feed cutoff, bypass and drainage systems?	✓		
(2) Corrosion or releases of waste in above ground portions?	✓		
(3) Data gathered from monitoring and leak detection equipment e.g., pressure and temperature gauges, monitoring wells?	✓		
Construction materials and area surrounding the tank, including secondary containment (e.g., dikes) for erosion or signs of releases (e.g., wet spots, dead vegetation)?	✓		N/A

Note: If the primary purpose of this inspection is to evaluate compliance with HW storage tank reg's, complete checklists in OSWER guidance of 7/17/87.

Cont'd., TANKS, 265:J

	Yes	No	Comments
Are sources of impressed current inspected at least every other month? 265.195(b)(2)	✓		
Are cathodic protection systems inspected six months after initial installation and then annually? 265.195(b)(1)	✓		
If a leak has occurred in the tank system, has the facility complied with 265.196 (p. J9)? 265.194(c)			NA
Ignitable and reactive waste:			
Is ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity? 265.198(a)(1)(i-ii) or:	✓		
Is ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? 265.198(a)(2) or:			
Is the tank used solely for emergencies? 265.198(a)(3)		✓	normal receptical for H.W. rag layer of oil.
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in table 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.198(b)	✓		
Are incompatible wastes stored in separate tanks? 265.199(a)	✓		
Is HW not placed in non-decontaminated tanks that previously held an incompatible waste or material? 265.199(b)	✓		
Whenever a tank system is to be used to chemically treat or store a HW which is substantially different from waste previously handled in the tank, ...			Ques. Cont'd on next page

Cont'd. Question; TANKS, 265:J	Yes	No	Comments
... or chemically treat HW with a substantially different process than was previously used, did the facility: 265.200-			
(a) Conduct waste analysis and trial treatment or storage tests (bench-tests)? or:	___	___	NA
(b) Have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions?	___	___	NA
Construction, containment, and assessment: Was the tank system or component used to treat HW installed after 7/14/86? If YES, go to new tank systems (next page).	___	___	NA
If an existing tank system (installation commenced or committed before 7/14/86) with a secondary HW containment system, go to 265.193 (p. J6)	___	___	NA
If an existing tank system without complying secondary containment, has the facility determined whether the tank system is either not leaking or unfit for use? 265.191(a)	___	___	
If found to be leaking or unfit for use, has the facility complied with 265.196 (p. J9)? 265.191(d)	___	___	
If fit for use, has the facility obtained a written assessment that attests to the tank system's integrity by 1/12/88*? 265.191(a)	___	___	
* Or within 12 months after their waste is listed as HW. 265.191(c)			
Was the assessment on file at the facility, and certified by an independent, registered professional engineer? 265.191(a)	___	___	
Did the assessment consider: 265.191(b)-			
(1) Original blueprints and standards?	___	___	
(2) HW characteristics?	___	___	
(3) Existing corrosion protection measures?	___	___	
(4) Documented age of tank, if known?	___	___	
(5) Leak test, internal inspection, or integrity test results?	___	___	

Cont'd., TANKS, 265:J	Yes	No	Comments
Design and installation of new tank systems:			
Does the facility have a tank system or component that is used to treat or store HW and was installed after 7/14/86?	___	___	NA
Has the facility obtained an assessment certified by an independent, registered, professional engineer attesting that the tank or component design is acceptable? 265.192(a)	___	___	
Did the assessment include: 265.192(a)-			
(1) Function and design standards?	___	___	
(2) Hazardous characteristics of the wastes to be handled?	___	___	
(3) Corrosion? (see next page)	___	___	
(4) Protection against vehicular traffic?	___	___	
(5)(i) Strength of the foundation?	___	___	
(5)(ii) Anchoring to prevent flotation or dislodgement?	___	___	
(5)(iii) Effects of frost heave?	___	___	
A certifications on file to attest that the installation steps and inspections, and any required repairs, were properly performed? 265.192(g)	___	___	
Was there installation include before-use inspection and repair of any: 265.192(b)-			
(1) Weld breaks?	___	___	
(2) Punctures?	___	___	
(3) Scrapes of protective coating?	___	___	
(4) Cracks?	___	___	
(5) Corrosion?	___	___	
(6) Other damage or inadequacies?	___	___	
Was the proper backfilling of underground tanks or components certified? 265.192(c)	___	___	
Were all tanks tested (and repaired) for tightness? 265.192(d)	___	___	
Were ancillary equipment certifiably supported and protected against physical damage and excessive stress due to settlement, vibration, expansion, and contraction? 265.192(e)	___	___	

Cont'd., TANKS, 265:J

	Yes	No	Comments
N tank corrosion certification:			
Where the external shell of a metal tank or any metal component touches soil or water, was the tank design and installation supervised and certified by a corrosion expert? 265.192(a)(3)	___	___	N/A
Did the corrosion certification consider these factors: 265.192(a)(3)(i)-			
(A) Soil moisture content?	___	___	
(B) Soil pH?	___	___	
(C) Soil sulfides level?	___	___	
(D) Soil resistivity?	___	___	
(E) Structure to soil potential?	___	___	
(F) Influence of nearby underground metal structures or piping?	___	___	
(G) Stray electric current?	___	___	
(H) Existing corrosion-protection measures (coating, cathodic protection, etc.)?	___	___	
Was at least one of the following used to ensure tank integrity: 265.192(a)(3)(ii)			
(A) Corrosion-resistant constructions materials such as special alloys fiberglass-reinforced plastic, etc.?	___	___	
(B) Corrosion-resistant coatings such as epoxy or fiberglass?	___	___	
(C) Electrical isolation devices such as insulating joints, flanges, etc.?	___	___	
Was a secondary containment system provided for any: 265.193(a)			
(1) New tank systems or components before installation?	___	___	
(2) Existing tanks used to treat or store F020, F021, F022, F023, F026, F027, by 1/12/89?	___	___	
(3) Existing tanks of proven age, by the later of 1/12/89 or 15 years old?	___	___	

Cont'd., TANKS, 265:J

	Yes	No	Comments
(4) Existing tanks of undocumented ac[illegible] by 1/12/95, or if the facility was built before 1980, by the later of 1/12/89 or the facility reaching 15 years of age?	___	___	NA
(5) Tank systems that handled materials that became hazardous wastes after 1/12/87, within two years of regulation or the facility reaching 15 years of age?	___	___	
If NO, to any of the above, has a variance been obtained from the RA? 265.193(g)	___	___	
Are the containment systems: 265.193(b)-			
(1) Designed, installed, and operated to prevent any releases to soil or water at any time during operation? and:	___	___	
(2) Capable of detecting, collecting, and holding releases from the tank?	___	___	
To meet these requirements, are the containment systems: 265.193(c)-			
(1) Compatible with wastes handled, and strong enough to prevent failure due to pressure (including ground water), weather, installation, or daily operations?	___	___	
(2) Placed on a foundation that withstands settlement, compression, or uplift?	___	___	
(3) Provided with a leak detection system that detects any releases within 24 hours (if possible)?	___	___	
(4) Sloped or drained to remove all liquids within 24 hours (if possible)?	___	___	
Does the secondary containment for tanks include one of these devices: 265.193(d)-			
(1) A liner external to the tank?	___	___	
(2) A vault?	___	___	
(3) A double-walled tank? or:	___	___	
(4) An equivalent approved by the RA?	___	___	

Cont'd., TANKS, 265:J	Yes	No	Comments
If an external liner is used, does it: 265.193(e)(1)-			
(i) Contain 100% of the largest tank volume?	___	___	NA
(ii) Either prevent run-on or rain from entering, or have added capacity to contain a 25-year, 24-hour storm?	___	___	
(iii) Be free of cracks or gaps?	___	___	
(iv) Capable of preventing lateral and vertical migration of waste?	___	___	
If a vault system is used, does it: 265.193(e)(2)-			
(i) Contain 100% of the largest tank volume?	___	___	
(ii) Either prevent run-off or rain from entering, or have added capacity to contain a 25-year, 24-hours storm?	___	___	
(iii) Have any joints sealed?	___	___	
(iv) Have an impermeable liner or coating over the concrete?	___	___	
(v) Protect against vapor formation from ignitable or reactive wastes?	___	___	
(vi) Have an exterior moisture barrier to prevent seep-in?	___	___	
If a double-walled tank is used, is it: 265.193(e)(3)-			
(i) One integral structure?	___	___	
(ii) Protected from interior and exterior corrosion?	___	___	
(iii) Provided with a leak detection system capable of detecting a leak within 24 hours (if possible)?	___	___	
Is all ancillary equipment provided with full secondary containment e.g., trench, jacketing, double-walled pipe (except for the following if inspected daily for leaks): 265.193(f)-			
(1) Above ground pipes?	___	___	
(2) Welded flanges, joints, and connections?	___	___	
(3) Seal-less or magnetic coupling pumps?	___	___	
(4) Pressurized above ground piping systems w/automatic shut-off devices?	___	___	

Cont'd., TANKS 265:J	Yes	No	Comments
Leaks, spills, unfit-for-use tanks:			
If a tank system or secondary containment system has had a leak or spill, or is unfit for use, was it immediately removed from service? 265.196	___	___	NA
Did the facility immediately stop the flow of HW into the system, and inspect to determine the cause of the release? 265.196(a)	___	___	
If the release was from the tank system, within 24 hours of detection (if possible) did they remove enough waste to prevent further release and allow inspection and repair? 265.196(b)	___	___	
If the release was to a secondary containment system, were all released materials removed in 24 hours? 265.196(b)(2)	___	___	
If the release was to the environment, did the facility immediately conduct a visual inspection of the release? 265.196(c)- and:	___	___	
(1) Contain it to prevent further migration to soils or surface water?	___	___	
(2) Remove and properly dispose of any visible contamination of the soil or surface water?	___	___	
Was the leak or spill of HW: 265.196(d)(2)-			
(i) Less than or equal to one pound? and,	___	___	
(ii) Immediately contained and cleaned up?	___	___	
If not, was the spill or leak reported to the RA within 24 hours? 265.196(d)(1)	___	___	
If the reportable leak was a release to the environment, was a full report submitted to the RA within 30 days of detection? 265.196(d)(3)	___	___	

Cont'd., TANKS, 265	Yes	No	Comments
Did the environmental release report include: 265.196(d)(3)-			
(i) Likely route of migration?	___	___	N/A
(ii) Characteristics of the surrounding soil composition, geology, hydrogeology, and climate?	___	___	
(iii) Results of any monitoring or sampling? (See next page for continued question)	___	___	
If not, were the results forwarded to the RA as soon as the analysis was received?	___	___	
(iv) Proximity to downgradient drinking water, surface water, and population areas?	___	___	
(v) A description of response actions taken or planned?	___	___	
Repair, containment, or closure:			
If the cause of the release was a spill that did not damage the integrity of the system was waste removed and necessary repairs made before returning the system to service? 265.196(e)(2)	___	___	
If the cause of the release was a leak from the primary tank system into the secondary tank system, was the system repaired before returning to service? 265.196(e)(3)	___	___	
If the source of any leak to the environment was from an aboveground, visually accessible component, was it repaired and certified before being returned to service? 265.196(e)(4)	___	___	
If the source of any leak to the environment was from a component or tank without secondary containment, and was below ground (or above ground but not readily accessible for visual inspection, e.g., the bottom of an onground tank), was the tank or entire component provided with secondary containment (265.193) before being returned to service? 265.196(e)(4)	___	___	

Cont'd., TANKS, 265:J	Yes	No	Comments
If the answer to any of the above four questions was NO, did the facility close the unit in accordance with 265.197 265.196(e)(1)			NA
If the facility has extensively repaired a tank system that leaked, was the repaired system certified capable by an independent, registered professional engineer? 265.196(f)			
Was the certification submitted to the RA within 7 days after returning the system to use? 265.196(f)			
If a tank system or component was replaced, did it comply with 265.192, new tanks ? 265.196(e)(4)			
Tank closure and post-closure care:			
At closure, did the facility remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), structures, soil, and equipment? 265.197(a)			
If the facility demonstrated that all contaminated soils cannot be removed or decontaminated, did they close the tank and perform post-closure care as if a landfill? 265.197(b)			
If the facility has a tank system without complying secondary containment or an exemption, did they include contingent closure and post-closure plans covering the care and reporting provisions for landfills? 265.197(c)(1-2)			
Did they include the contingent plans in the cost estimate? 265.197(c)(3)			
Did they include the contingent plans' costs in the financial assurance and responsibility estimates? 265.197(c)(4-5)			
See also Subparts G, H.			

Generators of Between 100 and 1,000 kg/month that accumulate HW in Tanks
(Part 265, Subpart J)

	Yes	No	Comments
For HW generators of between 100-1000 kg./mo. that accumulate in tanks for less than 180 days*, and do not accumulate over 6000 kg. on-site at any time: 265.201(b) (*Or 270 days if they must ship the HW over 200 miles.)	___	___	NA
(1) Does treatment or storage of HW in tanks comply with 265.17(b)?	___	___	
(2) Are HW or treatment reagents not placed in a tank if they could cause the tank or inner liner to fail?	___	___	
(3) Do uncovered tanks have at least 2 feet (60 centimeters) of freeboard or overflow containment capacity equal to the volume of the top 2 feet?	___	___	
(4) Where HW is continuously fed into a tank, is there a means to stop inflow?			
Does the 100-1000 kg./mo. generator inspect the following: 265.201(c)	___	___	
(1) Discharge control equipment (waste feed cut-off and by-pass systems, drainage systems) daily?	___	___	
(2) Data from monitoring equipment (pressure and temperature gauges) daily?	___	___	
(3) Waste levels in tanks daily?	___	___	
(4) Tank construction materials for corrosion or leaking fixtures and seams weekly?	___	___	
(5) Construction materials and area surrounding the tank, including secondary containment (dikes) for erosion or signs of releases (wet spots, dead vegetation) weekly?	___	___	
Are ignitable or reactive waste not placed in a tank unless: 265.201(e)(1)			
(i) The waste is treated, rendered, or mixed before or immediately after placement in a tank so that the			

...Question continue on next page..

Cont'd., TANKS, 100-1000 Kg/mo.	Yes	No	Comments
. resulting waste no longer meets the definition of ignitability or reactivity? or:	____	____	_____
(ii) The waste is stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react? or:	____	____	_____
(iii) The tank is used solely for emergencies?	____	____	_____
Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981)? 265.201 (e) (2)	____	____	_____
Unless 265.17 (b) is complied with: 265.201 (f)			
(1) Are incompatible wastes stored in separate tanks?	____	____	_____
?) Is HW not placed in unwashed tanks that previously held an incompatible waste or material?	____	____	_____

SURFACE IMPOUNDMENTS:
(Part 265 Subpart K)

	Yes	No	Comments
Has the facility installed two or more liners and a leachate collection system for each new unit, replacement unit, or lateral expansion of an existing unit that has received HW after 5/8/85? 265.221(a) or:	___	___	_____
Has the RA approved a waiver? 265.221(c-d)	___	___	_____
For existing interim status HW surface impoundments not covered above, did the facility retrofit the impoundment by 1 /8/88? HSWA 3005(j)(1) or:	___	___	_____

	Yes	No	Comments
[illegible] products meet the applicable treatment or prohibition standards in Part 268 Subpart D (see checklist) for each recyclable HW constituent they contain?*			NA
If NO to any of 266.20(b) above, did the facility comply with all RCRA TSD facility requirements? 266.21,-22,-23			
If the recyclable materials used in a manner constituting land disposal were subject to provisions of 266.20(b) regarding treatment standards and prohibition levels, did the recycler submit a certification (see 268.7(b) (5)), and a notice listing the EPA HW number, corresponding treatment standard, and any analysis, to the RA? 268.7(b)(8) and:			
Has the recycler kept records of the name and location of each entity receiving the waste-derived product? 268.7(b)(8)			
H[illegible] the facility not sprayed waste and/or used oil contaminated with dioxin or any other HW (except those listed solely for ignitability) on roads for dust suppression or road treatment? 266.23(b)			

*Except zinc-containing fertilizers using HW K061 that are produced for the general public's use. They are exempt. 266.20(b)

Hazardous Waste Burned for Energy Recovery: (Part 266 Subpart D)

	Yes	No	Comments
Does the facility handle hazardous wastes (including fuels produced from HW by blending, processing, or other treatment) that are burned for energy recovery in a boiler or industrial furnace?* 266.30(a)	✓		EOI - takes used oil >2500 [illegible] c o processes it to make "Luba distalate" L.D. is Burned as fuel or sold as fuel.

Are these HW fuels exempt from this [illegible]part because they are: 266.30-

Cont'd., RECYCLING, 266

	Yes	No	Comments
(a) Gas recovered from HW management activities and burned for energy recovery?		✓	
(b)(1) Used oil that is a HW solely because it exhibits a Part 261 Subpart C characteristic? (See 266 Subpart E, Used Oil Burned for Energy Recovery.)		✓	
(b)(2) Wastes that are exempt under Part 261.4 (Exclusions), or 261.6(a)(3)(v-ix)?		✓	
(b)(2) From conditionally-exempt small quantity generators (261.5)?		✓	
Does the facility ensure that no fuel which contains HW is burned in any cement kiln which is located within the boundaries of any incorporated municipality with a population >500,000 unless the kiln fully complies with incinerator regulations? 266.31(c)	✓		
If the facility generates or initiates a shipment of HW fuel, have they complied with Part 262 (generator) requirements? 266.32(a) and 266.34(d)	✓		
If the facility transports HW fuel or HW used to produce a fuel, have they complied with Part 263 (transporter) requirements? 266.33	✓		
If the facility stores HW fuel, have they complied with all applicable HW storage facility regulations? 266.34(c), 266.35(c)(1-3)		✓	see 262.34 A-L 265 A-L

*Except incinerators regulated under 265 Subpart O. Boilers must meet the specifications defined on Page 88, "260.10 DEFINITIONS - (Part 266)"

Cont'd., HW BURNED for ENERGY RECOVERY: 266-D

	Yes	No	Comments
Marketers:			
Does the facility market HW fuel? (e.g., generators who market HW fuel directly to a burner, distributors of HW fuel, facilities that received HW from generators and produce, process, or blend HW fuel) 266.34	✓		EOI sells "Lube distillate derived from HW oil > 1000 ppm total halogens.
Have they notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.34(b)	✓		Yes notified 10/9/90 but since they noti
Before they initiate the first shipment of HW fuel to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			
The burner or marketer has notified EPA and identified his waste-as-fuel activities? 266.34(a), 266.34(e)(1)(i)	✓		EOI appears to be exempt if only accepts that oil from conditionally exempt small quant generators.
If the recipient is a burner, the burner will burn HW fuel only in a unit identified in 266.31(b)(p. D3)? 266.34(a), 266.34(e)(1)(ii)	✓		
Before a marketer accepts the first shipment of HW fuel from another marketer, has he provided the other marketer with the notice described above? 266.34(e)(2)			N/A
Has the marketer kept copies of each certification notice received or sent for three years from the date he last engages in HW fuel transactions with each person? 266.34(f)	✓		
Has the facility* that burns HW fuel: 266.35-			
(a) Met 266.31(b) below?		✓	see below
(b) Notified the EPA of their HW fuel activity (even if they previously notified of other HW management and received an EPA ID#)? 266.35(b)		✓	EOI Burns some of the "Rag Layer" during operations (F001 & F002)

Cont'd., Recycling-Burning, 266:D

	Yes	No	Comments
Before the burner accepts the first shipment of HW fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.35(d)			
(1) He has notified EPA and identified his waste-as-fuel activities?	✓		EOI has burned HW Fuel that IT generated "Rag Layer" F001+2
(2) He will burn the fuel only in a unit identified in 266.31(b) below?	✓		
Has the burner kept copies of each certification notice sent to a marketer for three years from the date he last received HW fuel from the marketer? 266.35(e)	✓		

Prohibitions:

Hazardous waste fuel may be burned for energy recovery in only the following devices: 266.31(b)

(1) Industrial furnaces, as defined in 260.10

(2) Boilers, as defined in 260.10 that are identified as follows:

(i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or

(ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale.

*Includes generator that burn their own HW fuel on-site.

USED OIL BURNED FOR ENERGY RECOVERY
(Part 266 Subpart E)

	Yes	No	Comments
Does the facility handle used oil burned for energy recovery in any boiler or industrial furnace (except 265 Subpart O incinerators)?* 266.40(a)	✓		

Cont'd., 266: Subpart E

	Yes	No	Comments
Does the used oil fuel burned for energy recovery meet the qualifications: 266.40-			- Some does
Contains HW from conditionally exempt small quantity (261.5) generators only? -(d)(2) or:	✓		
Has not been mixed with HW and exhibits only 261 Subpart C HW characteristics? -(c), -(d)(1)	✓		
and:			
Contains no more than 1,000 ppm total halogens?** -(c)		✓	excepted used oil with up to 2500 ppm T.H. but only from CESQG (not reg. under Sub. D)

If NO, the used oil is a HW fuel. Go to 266 Subpart D. 266.40(c)-(d)(2)

USED OIL EXCEEDING ANY SPECIFICATION LEVEL IS SUBJECT TO THIS SUBPART WHEN BURNED FOR ENERGY RECOVERY***

CONSTITUENT/PROPERTY	ALLOWABLE LEVEL
ARSENIC (As).........	5 ppm maximum
CADMIUM (Cd).........	2 " "
CHROMIUM (Cr)........	10 " "
LEAD (Pb)............	100 " "
FLASH POINT..........	100 oF minimum
TOTAL HALOGENS.......	4,000 ppm maximum**

*"Used oil" means any oil that has been refined from crude oil, used, and as a result of such use, is contaminated by physical or chemical impurities. "Used oil fuel" includes any fuel produced from used oil by blending, processing, or other treatment. 266.40(a) See also p. -266: Definitions-.

**Used oil containing >1,000 ppm total halogens is presumed to by a HW (due to mixing with other HWs) until successfully rebutted (i.e., demonstrated not to contain Appendix VIII halogenated hazardous constituents).

***The specifications do not apply if mixed with any HW not from a conditionally exempt SQG.

Cont'd, Used Oil Burned for Energy Recovery: - (Part 266 Subpart E)

	Yes	No	Comments
Does the facility market* used oil fuel? 266.43(a)	___	___	NA _____

* e.g., generators who market used oil fuel directly to a burner, distributors of used oil fuel, facilities that receive used oil from generators and produce, process, or blend used oil fuel.

Is the facility exempt from marketer regs. because they: 266.43(a)-

(1) Are used oil generators, or collectors who transport used oil received only from generators, who do not market directly to a person who burns it for energy recovery? or:	___	___	_____
(1) Market to burners who are only burning some of the used oil fuel incidentally to processing or other treatment before they then market? or:	___	___	_____
(2) Only market used oil fuel that another facility has already claimed meets the specifications?	___	___	_____

If the facility is the first to claim the used oil meets specifications (and is thus exempt) have they: 266.43(b)(1), -(6)-

(i) Kept copies of the analysis or determination for 3 years?	___	___	_____
(ii) Recorded in an operating log:			
(A) The name and address of the facility receiving the shipment?	___	___	_____
(B) The quantity delivered?	___	___	_____
(C) The date of shipment/delivery?	___	___	_____
(D) A cross reference to the analysis?	___	___	_____
Have they notified EPA of their used oil management activity, even if they previously notified of other HW management and received an EPA ID#? 266.43(b)(3)	___	___	_____

Cont'd., Used Oil Burned for Energy Recovery: Part 266 Subpart E

	Yes	No	Comments
Before they initiate the first shipment of <u>off-spec. used oil</u> to a burner or another marketer, did the facility obtain a one-time written and signed notice from the recipient certifying that:			NA
The burner or marketer has notified EPA as above? 266.41(a), 266.43(b)(5)(A)	___	___	_____
If the recipient is a burner, the burner will burn the fuel only in a unit identified in 266.41(b) (p. E4)? 266.43(a),-(b)(5)(B)	___	___	_____
Before a marketer accepts the first shipment of off-spec. used oil from another marketer, has he provided the other marketer with the notice just described? 266.43(b)(5)(B)(ii)	___	___	_____
Has the marketer kept copies of each certification notice received or sent for three years from the date he last e[illegible]ages in off-spec. used oil transactions with each person? 266.43(b)(6)(ii)	___	___	_____
Before the facility initiates a shipment of off-spec. used oil, did they send an invoice to the receiving facility containing: 266.43(b)(4)-			
(i) An invoice number?	___	___	_____
(ii) The sender & receiver's ID #s?	___	___	_____
(iii) The names & address of both facilities?	___	___	_____
(iv) The quantity of off-spec. used oil to be delivered?	___	___	_____
(v) The dates of shipment/delivery?	___	___	_____
(vi) The following statement: "This used oil is subject to EPA regulation under 40 CFR Part 266"?	___	___	_____
Has the facility kept copies of i[illegible]oices received or sent for three years? 266.43(6)(ii)	___	___	_____

Cont'd., Used Oil Burned for Energy Recovery: Part 266 Subpart E

Burners:	Yes	No	Comments
Has the facility that burns off-spec. used oil fuel: 266.44-			NA
(a) Met 266.41(b) below?	___	___	_____
((b) Notified the EPA stating their location and describing their used oil management activity (even if they previously notified of other HW management and received an EPA ID No.)*? 266.43(b)	___	___	_____
Before the burner accepts the first shipment of off-spec. used oil fuel from a marketer, did the burner provide a one-time written and signed notice certifying that: 266.44(c)-			
(1) He has notified EPA as required?	___	___	_____
(2) He will burn the fuel only in a unit identified in 266.41(b) below?	___	___	_____
Has the burner kept copies of the one-time certification notice for three years after he last received oil from the marketer? 266.44(e)	___	___	_____
Has the burner kept copies of each invoice received for 3 years? 266.44(e)	___	___	_____
If the facility burns their own used oil fuel, have they either complied with all burner requirements or obtained analysis documenting that the used oil meets specifications? 266.44(d)(1)	___	___	_____
If the burner treats off-spec. used oil be processing, blending, or other treatment to meet the specifications, have they obtained analysis documenting that the used oil now meets specifications? 266.44(d)(2)	___	___	_____
Has the burner kept the analysis for three years? 266.44(e)	___	___	_____

*Except facilities using oil-fired space heaters under 266.41(b)(2).

Cont'd., Used Oil Burned for Energy Recovery: 266 E

Prohibitions:

Off-specification used oil may be burned for energy recovery only in the following devices: 266.41(b)-

(1) Industrial furnaces, as defined in 260.10 (see p. -266: Definitions-).

(2) Boilers, ad defined in 260.10 (see p. -266: Definitions-), that are identified as follows:

(i) Industrial boilers located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes; or

(ii) Utility boilers used to produce electric power, steam, or heated or cooled gases or fluids for sale; or

(iii) Used oil-fired space heaters provided that:

(A) The heater burns only used oil that the owner/operator generates or used oil received from do-it-yourself oil changers who generate used oil as household waste;

(B) The heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and

(C) The combustion gases from the heater are vented to the ambient air.

RECYCLABLE MATERIALS UTILIZED FOR PRECIOUS METALS RECOVERY
(Part 266 Subpart F)

	Yes	No	Comments
Does the facility generate, transport, or store recyclable materials that are reclaimed to recover economically significant amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? 266.70(a)	___	___	NA
Has the facility complied with the applicable requirements of: 266.70(b)-			
(1) RCRA 3010 Notifications?	___	___	

"Boiler" means an enclosed device using controlled flame combustion and having the following characteristics:

(1)(i) The unit must have physical provisions for recovering and exporting thermal energy in the form of steam, heated fluids, or heated gases; and

(ii) The unit's combustion chamber and primary energy recovery sections(s) must be of integral design. To be of integral design, the combustion chamber and the primary energy recovery sections(s) (such as waterwalls and superheaters) must be physically formed into one manufactured or assembled unit. A unit in which the combustion chamber and the and the primary energy recovery sections(s) are joined only by ducts or connections carrying flue gas is not integrally designed; however, secondary energy recovery equipment (such as economizers or air preheaters) need not be physically formed into the same unit as the combustion chamber and the primay energy recovery section. The following units are not precluded from being boilers solely because they are not of integral design: process heaters (units that transfer energy directly to a process stream), and fluidized bed combustion units; and

(iii) While in operation, the unit must maintain a thermal energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and

(iv) The unit must export and utilize at least 75 percent of the recovered energy, calculated on an annual basis. In this calculation, no credit shall be given for recovered heat used internally in the same unit. (Examples of internal use are the preheating of fuel or combustion air, and the driving of induced or forced draft fans or feedwater pumps); or

(2) The unit is one which the Regional Administrator has determined, on a case-by-case basis, to be a boiler, after considering the standards in 260.32.

"Industrial furnace" means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame devices to accomplish recovery of materials or energy:

(1) Cement kilns
(2) Lime kilns
(3) Aggregate kilns
(4) Phosphate kilns
(5) Coke ovens
(6) Blast furnaces
(7) Smelting, melting, and refining furnaces (including pyrometallurgical devices such as cupolas, everberator furnaces, sintering machine, roasters, and foundry furnaces)
(8) Titanium dioxide chloride process oxidation reactors
(9) Methane reforming furnaces
(10) Pulping liquor recovery furnaces
(11) Combustion devices used in the recovery of sulfur values from spent sulfuric acid.

LAND DISPOSAL RESTRICTIONS:
(Part 268)

	Yes	No	Comments
Did the facility handle any waste restricted from land disposal since its effective prohibition date:* 268.1(b) (See Attachment B for listings from 261, Subpart D)			
F001 through F005 spent solvents?	✓		
F020 through F026-28 Dioxins?		✓	
"California List" wastes?	✓		
1st, 2nd, or 3rd 3rds?	✓		
Toxicity Characteristic wastes?	✓		
■Exemptions: Are the restricted wastes exempted from land disposal restrictions because:			
They are hazardous only by characteristic and disposed into a non-hazardous or hazardous injection well as defined in Part 144.6(a) and do not exhibit any prohibited characteristic of hazardous waste at point of injection? 268.1(c)(3)		✓	
An "imminent endangerment" waiver has been granted under 121(d)(4) of CERCLA? 268.1(d)		✓	
The waste is from conditionally-exempt small quantity generators? 268.1(e)(1)		✓	
A farmer is disposing of waste pesticides in accordance with 262.70? 268.1(e)(2)			NA
EPA has not promulgated land disposal prohibitions or treatment standards for wastes identified or listed as hazardous after November 8, 1984? 268.(e)(3)			NA

■ *Land disposal means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault or bunker for disposal purposes. 268.2(c) Injection wells are being covered under a separate schedule (Part 148).

Cont'd., LDR, 268:

If no restricted wastes were handled after the effective dates or an above exemption applies to all restricted wastes handled, do not complete remainder of this section.

	Yes	No	Comments
■ Exceptions: Can the restricted wastes continue to be land disposed because:			
A case-by-case extension has been granted under Subpart C or 268.5, for the wastes handled? See 268.1(c)(1-4), 268.30(d)(3)(F001-5), 268.31(d)(3)(dioxins), 268.32(g)(2)(CA list), 268.33(e)(3)(1st 3rd)(2nd 3rd), 268.35(i)(4)(3rd 3rd), and 268.1(c)(2).	___	___	NA
An exemption has been granted because the waste is certified treated by the best demonstrated available technology (BDAT)? 268.44(a)	___	___	NA
If any of the preceding exceptions apply, the attached effective 268 Subpart C dates and concentrations, Subpart D standards and Subpart E storage restrictions do not apply. Waste analysis and applicable generator certification requirements still pertain.			
Except for characteristic wastes subsequently discharged under NPDES permit or in compliance with pre-treatment requirements under Section 307 of the CWA, has the handler not merely diluted the restricted waste or treatment residue in order to achieve compliance? 268.3	___	___	NA

STORAGE:

Are restricted wastes only being stored where: 268.50-			
(a)(1) A generator is using tanks or containers while accumulating a sufficiently large batch to properly recover, treat, or dispose?	___	___	NA
(a)(2) A TSD is accumulating a batch as above? and:	___	___	
(i) Each container is marked with the contents and accumulation start date?	___	___	
(ii) Each tank is marked with the contents, accumulation start date, quantity of HW, and/or the information is in the operating record?	___	___	

Cont'd., LDR, Storage	Yes	No	Comments
(c) The TSD can prove that any storage over one year was solely for the purpose of necessary accumulation?	___	___	N/A
or:			
(d) The wastes are subject to an approved no-migration petition, case-by-case extension, a nation wide variance, or a valid "soft hammer" 268.8 certification?	___	___	
(e) The stored wastes already meet any applicable treatment, concentration, or waiver standards?	___	___	
(f) After 7/8/87, are liquid HW over 50 ppm PCBs stored for less than a year, and in a 761.65(b) (TSCA) complying storage area?	___	___	

See "Off-site storage facility record keeping requirements."

Generators: Waste Analysis

If restricted wastes are generated on site, has the generator, using knowledge or analysis, determined if the waste is restricted from land disposal? 268.7(a)	✓	___	
Was the Paint Filter Liquids Test used to determine if waste sludges and solids were CA list liquids? 268.32(i)	✓	___	
Did the generator determine if liquid CA list wastes sludges and solids were CA list liquids? 268.32(j)(1)	✓	___	
Did the generator determine if liquid CA list wastes containing PCBs or HOCs were prohibited? 268.32(j)(2)	✓	___	
■ Did the generator determine whether a HW listed in 268.10, -.11, -.12, exceeds the applicable treatment standards specified in 268.41, and -.43 by testing a representative sample of the waste extract or the entire waste, or use knowledge of the waste? 268.35(j)	✓	___	

Note: See Attachs. B, C, D, E, F, G for above referenced tables.

Cont'd., LDR & Treatment Standards

	Yes	No	Comments
Where waste treatment standards are expressed as concentrations in the waste extract (268.41), did any analysis include the TCLP (268 Appendix I)? 268.33(g)	✓		

Notices, Certifications, and Demonstrations:

If determined that the waste is restricted and requires treatment before land disposal, have they notified the treatment or storage facility with each shipment of waste? including: 268.7(a)(1)-			EoI supplied us with the form that ~~you~~ use for LDR Notification but not The filled out copies require with the manifest.
(i) EPA HW ID number?			NA
(ii) Appropriate treatment standards and prohibitions?			
(iii) Manifest number for the waste?			
(iv) Available waste analysis data?			
If the waste is determined to be restricted but not required further treatment, has the generator submitted with each shipment to the treatment, storage or land disposal facility, a notice and a certification that the waste meets both treatment standards and applicable prohibitions? 268.7(a)(2)			
Did the notification include: 268.7(a)(2)(i)-			
(a) EPA HW ID number?			
(b) Appropriate treatment standards and prohibitions?*			
(c) Manifest number for the waste?			
(d) Available waste analysis data?			

Was the following certification signed: 268.7(a)(2)(ii)- NA

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Cont'd., LDR, Notices

■*Note: All notifications for F001-F005, F039 and wastes prohibited pursuant to 268.32 or RCRA Section 3004(d) must have the specific treatment standard entered on each form. Treatment standards for all other HWs may be referenced by including on the notification the sub-category of the waste, the treatability groups(s) of the waste(s), and the CFR section(s) and paragraphs where the treatment standards appear.

	Yes	No	Comments
■ If the generator's waste is subject toan <u>exemption from a prohibition</u> on the type of land disposal method utilized for such waste (e.g., a case-by-case extension under 268.5, an exemption under 268.6, or a nationwide variance), have they notified the receiving facility with each shipment of waste that the waste is not prohibited from land disposal? 268.7(a)(3)	___	___	NA ↓
Did the notice include: 268.7(a)(3)-			
(i) EPA HW ID number?	___	___	
(ii) Appropriate treatment standards and prohibitions?	___	___	
(iii) Manifest number for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
(v) The date the waste is subject to prohibitions?	___	___	

NOTE: If an off-site shipment without notification has occurred, indicate the accepting TSD facility below for inspection follow-up.

■ If a generator is <u>treating prohibited wastes in tanks or containers to meet applicable treatment standards,</u> has a waste analysis plan been developed and implemented which:			
■ (a) Is kept on-site in the generator's records? 268.7(a)(4)	___	___	NA
■ (b) Is based on chemical and physical analysis of waste(s) being treated and contains all information to treat waste in accordance with standards, including the selected testing frequency? 268.7(a)(4)	___	___	↓

Cont'd., LDR, Treat./Containers	Yes	No	Comments
■ (c) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)	✓		
■ Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	✓		
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	✓		
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)		✓	only a form was available at the time of the inspection. EOI did not have copies of completed forms from actual shipments on site as required
■ If a generator is managing a labpack that contains wastes identified in Part 268, Appendix IV, and wishes to use the alternative treatment standard under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(7)			NA
■ Complied with 268.7(a)(5) and (a)(6) and submitted the following certification? 268.7(a)(7)			NA

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."

■ If a generator is managing a labpack that contains organic wastes specified in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, noticed the treatment facility pursuant to 268.7(a)(1)? 268.7(a)(8)			NA

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste

Cont'd., LDR, Treat./Containers	Yes	No	Comments
■) Was filed with the RA or authorized state a minimum of 30 days prior to treatment? 268.7(a)(4)	___	___	NA
■ Have wastes shipped off-site complied with notification requirements of 268.7(a)(2)? 268.7(a)(4)	___	___	
If determined that the waste is restricted based solely on knowledge, is all supporting data used in the determination maintained on-site in the generator's files? 268.7(a)(5)	___	___	
Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other Part 268 records for at least five years? 268.7(a)(6)	___	___	
■ If a generator is managing a <u>labpack</u> that contains wastes identified in Part 268, Appendix IV, and wishes to use the alternative treatment standard u er 268.42, has the generator, with each shipment of waste, <u>noticed the treatment facility</u> pursuant to 268.7(a)(1)? 268.7(a)(7)	___	___	
■ Complied with 268.7(a)(5) and (a)(6) and submitted the following <u>certification?</u> 268.7(a)(7)	___	___	

"I certify under penalty of law that I personally have examined and am familiar with the waste and that the labpack contains only the wastes specified in Appendix IV to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."

■ If a generator is managing a <u>labpack that contains organic wastes specified</u> in Part 268, Appendix V, and wishes to use the alternative treatment standards under 268.42, has the generator, with each shipment of waste, <u>noticed the treatment facility</u> pursuant to 268.7(a)(1)? 268.7(a)(8)	___	___	NA

" certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste

Cont'd., LDR, Notices/LABPACKS
and that the labpack contains only organic wastes specified in Appendix V to Part 268 or solid wastes not subject to regulation under 40 CFR Part 261. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine or imprisonment."

	Yes	No	Comments
■ If the facility is a small quantity generator with tolling agreements pursuant to 262.20(e), has it complied with notification and certification requirements of 268.7(a) for the initial shipment of waste subject to the agreement? 268.7(a)(9) and,	___	___	NA
■ Retained a copy, on-site, of notification, certification, and tolling agreement, for at least 3 years after expiration of agreement? 268.7(a)(9)	___	___	NA
Special Rules for Wastes that Exhibit a Characteristic: ■ Did the initial generator determine each waste code applicable to the waste pursuant to 268.9(a) and (b)?	✓	___	
■ In addition to any applicable standards determined from the initial point of generation, has the characteristic waste that has been land disposed complied with the treatment standards under Part 268 Subpart D? 268.9(c)	✓	___	
■ Has a notification and certification, required in 268.9(d), been sent to the RA or authorized state for shipment of non-hazardous waste to a Subtitle D facility? 268.9(d)	___	___	
■ Did the notification include the following: 268.9(d)(1)			
(i) Name and address of the Subtitle D facility?	___	___	
(ii) Description of waste as initially generated, including applicable EPA Hazardous Waste Number(s) and treatability group(s)?	___	___	

Cont'd, LDR, Treatment	Yes	No	Comments
(iii) Applicable treatment standards at initial point of generation?	___	___	NA
■ Has the certification been signed by an authorized representative and does it state the language in 268.7(b)(5)(i)? 268.9(d)(2)	___	___	
<u>Treatment Facilities: Waste Analysis</u> Has the facility tested their wastes as specified in their waste analysis plan (265.13)? 268.7(b)	___	___	
■ Were the wastes listed in Attachment B of this checklist treated using the technology specified in Attachment D? 268.42(a)	___	___	
■ Were non-liquid hazardous wastes containing HOCs in total concentration greater than or equal to 1000 mg/kg and liquid HOC-containing wastes prohibited under 268.32(e)(1) incinerated in accordance with the requirements of Part 265, Subpart O?* 268.42(a)(2)	___	___	
■ If wastes were not treated in compliance with methods specified in 268.42(a), (c), and (d), has the Administrator approved the use of an alternative treatment method pursuant to 268.42(b)?	___	___	
■ As an alternative to Subpart D treatment standards, labpacks are eligible for land disposal provided the following requirements are met: 268.42(c)			
■ Do the labpacks comply with the applicable provisions of 265.316? 268.42(c)(1)	___	___	
■ Are all hazardous wastes contained in such labpacks specified in Appendix IV or Appendix V to Part 268? 268.42(c)(2)	___	___	

Cont'd., LDR, Treatment	Yes	No	Comments
■ Have labpacks been incinerated in accordance with Part 265, Subpart O? 268.42(c)(3)	___	___	NA
■ Have any incinerator residues from labpacks containing D004, D005, D006, D007, D008, D010, and/or D011 been treated in compliance with treatment standards in Part 268, Subpart D? 268.42(c)(4)	___	___	NA

*These treatment standards do not apply where the waste is subject to a Part 268, Subpart C treatment standard for specific HOC such as a hazardous waste chlorinated solvent for which a treatment standard is established under 268.41(a).

Was the non-wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, incinerated in accordance with the requirements of Part 264 Subpart O, or burned in industrial furnaces or boilers in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(3)	✓	___	
Was the wastewater form of the following HWs listed in 268.10, 268.11, & 268.12, treated by carbon adsorption or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P062, P085, P109, P111, V058, V087, V221 and V223? 268.43(4)	___	___	NA
Were the treatment standards are expressed as concentrations in the waste extract (268.41), has the facility tested the treatment residues or extract (using the TCLP, 268 Appendix I) to assure they met the applicable treatment standards? 268.7(b)(1)	___	___	NA
Were the treatment standards are expressed as concentrations which may not be exceeded by the waste or . . . Continued on next page ...			

Cont'd., LDR, Treatment	Yes	No	Comments
. Treatment residual for the allowable land disposal of such waste or residue, has the facility demonstrated compliance with concentrations based on grab samples (unless otherwise noted in Attach. E)? 268.43(a)	___	___	NA
For CA list-only wastes, were the applicable 268.32 Paint Filter Liquids Test, pH test, HOCs, and PCB tests performed? 268.7(b)(2)	___	___	NA
For wastes with treatment standards expressed as concentrations in the waste (268.43), was the treatment residue, not an extract, tested? 268.7(b)(3)	___	___	NA
Notifications and certifications:			
Has the treater submitted with each shipment to the land disposal facility, a notice including: 268.7(b)(4)			NA
(i) EPA HW ID number?	___	___	
(ii) Appropriate treatment standards and prohibitions?	___	___	
(iii) Manifest number for the waste?	___	___	
(iv) Available waste analysis data?	___	___	
Has the treatment facility submitted a signed certification with each shipment of waste or treatment residue to the land disposal facility stating that the treatment standards in 268 Subpart D were met? 268.7(b)(5)	___	___	
■ For wastes with treatment standards listed as concentrations (268.41 or -.43) did the certification read: 268.7(b)(5)(i)	___	___	

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Cont'd., LDR, Treatment/ Notices	Yes	No	Comments
For wastes with treatment standards listed as technologies (268.42) did the certification read: 268.7(b)(5)(ii)	___	___	NA

"I certify under penalty of law that waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment ".

■ For wastes with treatment standards expressed as concentrations in the waste pursuant to 268.43, is compliance with the treatment standards in Part 268, Subpart D, based in part or in whole on the analytical detection limit alternative specified in 268.43(c)? 268.7(b)(5)(iii)	___	___	NA

■ If yes, then the certification also must state the following:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the non-waste water organic constituents have been treated by incineration in units operated in accordance with 40 CFR Part 264, Subpart O or, 40 CFR Part 265, Subpart O, or by combustion in fuel substitution units operating in accordance with applicable technical requirements, and I have been unable to detect the non-waste water organic constituents despite having used best good faith efforts to analyze for such constituents. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Were waste or treatment residues are sent off-site for further management, did the sender comply with the notification and certification requirements as the generator of the waste? 268.7(b)(6-7)	___	___	NA
If wastes otherwise prohibited from land disposal are treated in surface impoundments, has the facility met the following conditions: 268.4(a)			

(1) Treated, not just stored, the wastes in the impoundment? ___ ___ _____

Cont'd., LDR, Treatment: Surface Impoundments

	Yes	No	Comments
(2)(i) Analyzed all treatment residues (sludge and supernatant separately) to determine if they meet treatment and/or prohibition standards?	___	___	NA
(2)(ii) Removed, annually, all treatment residues (including liquids) that do not meet treatment or prohibition standards?*	___	___	
(2)(iii) Not placed the residues in another impoundment for subsequent management?*	___	___	
Has the facility certified that all impoundments used to treat restricted wastes meet design requirements (265.221(a))? 268.4(a)(3-4)	___	___	
Has the facility certified that it is in compliance with GW monitoring (265 Subpart F) requirements? 268.4(a)(3-4)	___	___	
Is there a principal means of treatment other than evaporation of HW constituents? 268.4(b)	___	___	
Does the waste analysis plan include the procedures and schedule for: 268.4(a)(2)(iv); 265.13(b)(7)-			
(i) Sampling the impoundment contents?	___	___	
(ii) The analysis of test data?	___	___	
(iii) The annual removal of residues which exhibit a HW characteristic?	___	___	
and: (A) Fail 268 Subpart D treatment standards? or:	___	___	
(B) Where no treatment standards have been established, such residues are prohibited from land disposal under: (1) 268.32 (CA list) or RCRA 3004(d)?	___	___	
(2) 268.33(f)(1st 3rd & 2nd 3rd)?	___	___	

*Unless the wastes have a valid "good faith" certification under 268.8. If the annual flow through the impoundments is greater than the combined volume of the impoundments, the supernatant is considered removed.

Cont'd., LDR, Disposal	Yes	No	Comments
Land Disposal Facilities:*			
■ Except where the owner or operator is disposing of any waste that is a recyclable material used in a manner constituting disposal pursuant to 266.20(b), has the owner or operator of the land disposal facility: 268.7(c)			
Have copies of all notices, certifications, and applicable demonstrations? 268.7(c)(1) (See also 265.73, Operating Record)	___	___	N/A
Tested the waste, or an extract of the waste or treatment residue (using the TCLP, 268 Appendix I) to assure that the wastes or residues are in compliance with land disposal restrictions? 268.7(c)(2)	___	___	
Was the testing performed according to the frequency specified in the waste analysis plan? 268.7(c)(2)	___	___	

■ *NOTE: 268.8(a), which permitted restricted wastes under 268.33(f) to be disposed in a landfill or surface impoundment that met certain requirements, is no longer in effect as of May 8, 1990. 268.8(a)

Various attachments

Attachment C

REGION 10 WASTE MINIMIZATION CHECKLIST

** SECTION A **

Section A applies to all fully regulated generators who manifest their hazardous waste offsite.

MANIFEST [3002(b)]

1. Does the generator use manifests to transport the hazardous waste? yes X no__

   period of review 89, 90, 91 spot checked

2. Do the manifests contain the certification that the generator has a program in place to reduce the volume and toxicity of waste generated to the degree determined by the generator to be economically practicable? yes X no__

3. Are the manifests signed? (by whom? - get the name) yes X no__

   NAME Generator TITLE operator

4. Is the certification portion of the manifests crossed out or marked in any way to indicate that a program to reduce the volume and toxicity of the waste is not in place? yes__ no X

5. Does the generator have a written waste minimization plan? yes X no__

6. If the generator does not have a written waste minimization plan, is the generator aware of the requirement to have a program in place to reduce the volume and toxicity of waste generated to the degree determined by the generator to be economically practicable? yes__ no__

7. If the waste minimization plan is not a written plan (i.e. the generator keeps the plan in his/her mind), request an oral description of the plan.

BIENNIAL REPORT [§262.41(a)(6)&(7)]

Dates of reports reviewed 89

1. Do the Biennial reports contain a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? yes__ no X

   Describe any deficiencies identified

2. Do the Biennial reports contain a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984. yes__ no X

Describe any deficiencies identified

3. Are the waste minimization descriptions (i.e. response to questions 1 and 2 above) in the Biennial Reports consistent with the waste minimization plan? yes__ no__

Waste min plan was not evaluated but has been submitted as part of Part B Permit app.

Describe any inconsistencies identified

ANNUAL REPORTS FOR GENERATORS WHO EXPORT THEIR HAZARDOUS WASTE
[§262.56(a)(5)(i) and (ii)]

Dates of reports reviewed NA

1. Do the Annual reports contain a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? yes__ no__

Describe any deficiencies identified

2. Do the Annual reports contain a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984. yes__ no__

Describe any deficiencies identified

3. Are the waste minimization descriptions (i.e. response to questions 1 and 2 above) in the Annual Reports consistent with the waste minimization plan? yes__ no__

Describe any inconsistencies identified

Comments on Section A: _____

SECTION B

Section B applies to generators who treat, store, and/or dispose of their hazardous waste on-site pursuant to a RCRA Part B permit.

ANNUAL CERTIFICATION [3005(h)]

1. Is the generator permitted for TSD activities? yes X no__

   Date of permit 10/10/85 Expiration date _____
   Type of TSD activity Treatment (State only) Transporter

2. Does the permit contain a condition requiring the permittee to certify annually that the generator (i.e. the permittee) of the hazardous waste has a program (waste minimization plan) in place to reduce the volume or quantity and toxicity of such waste to the degree determined by the generator to be economically practicable? yes__ no X

   Location of the condition in the permit _____

3. Did the permittee submit the annual certifications? yes X no__

   Years evaluated 89

4. Does the permittee have a written waste minimization plan? yes X no__

5. If the permittee does not have a written waste minimization plan, is the permittee aware of the requirement to have a program in place to reduce the volume and toxicity of waste generated to the degree determined by the permittee to be economically practicable? yes__ no__

6. If the waste minimization plan is not a written plan (i.e. the permittee keeps the plan in his/her mind), request an oral description of the plan.

BIENNIAL REPORT [40 CFR 264.75(h)&(i)

Dates of reports reviewed _____

1. Does the Biennial report contain a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? yes__ no X

   Describe any deficiencies identified

2. Does the Biennial report contain a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984. yes _no X

   Describe any deficiencies identified

3. Are the waste minimization descriptions (i.e. response to questions 1 and 2 above) in the Biennial Reports consistent with the waste minimization plan? yes__no__

   waste min plan was not evaluated.

   Describe any inconsistencies identified

Note: These facilities may also manifest their hazardous wastes off-site. If so, they are also subject to Section A of this checklist.

Comments on Section B: _____

SECTION C

Section C applies to generators who treat, store, and/or dispose of their waste on-site pursuant to interim status.

BIENNIAL REPORT [40 CFR 265.75(h)&(i)]

As HW fuel Burner EOT must comply with 265. regs, (266.35(c)(1)

Dates of reports reviewed _____

1. Do the Biennial reports contain a description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated? yes__ no X

   Describe any deficiencies identified

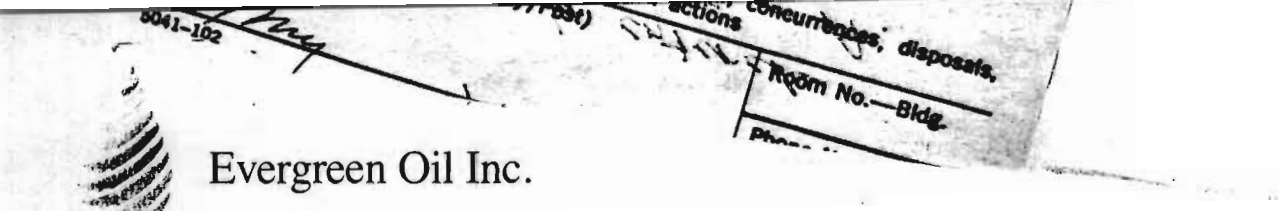
2. Do the Biennial reports contain a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984. yes__ no Y

   Describe any deficiencies identified

Note: These facilities may also manifest their wastes off-site. If so, they are also subject to Section A of this checklist.

Comments on Section C: _____

Attachment D



Evergreen Oil Inc.

June 6, 1991

Amy Sokolov
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Sokolov:

Enclosed please find a copy of our Part A application. Scott Colpitts asked me to send you a copy with a fresh signature on it.

If you need anything else, give me a call at (415) 795-4400.

Sincerely,

Jane Burns

Jane Burns
Environmental Manager

6880 SMITH AVENUE · NEWARK, CA 94560 · (415) 795-4400 · (800) 972-5284 · FAX: (415) 791-0126

For Regional Use Only

Date Received
Month Day Year

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

For State Use Only

JANE

I. ID Number(s)

A. EPA ID Number: C A D 9 8 0 8 8 7 4 1 8

B. Secondary ID Number (if applicable):

II. Name of Facility

E V E R G R E E N O I L I N C

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street: 6 8 8 0 S M I T H A V E N U E

Street (continued):

City or Town: N E W A R K

State: C A

ZIP Code: 9 4 5 6 0 -

County Code (if known):

County Name: A L A M E D A

B. Land Type (enter code): P

C. Geographic Location

LATITUDE (degrees, minutes, & seconds): 3 7 3 1 0 4 5

LONGITUDE (degrees, minutes, & seconds): 1 2 2 0 1 0 0 0

D. Facility Existence Date

Month Day Year: 1 0 1 0 1 9 8 5

IV. Facility Mailing Address

Street or P.O. Box: 6 8 8 0 S M I T H A V E N U E

City or Town: N E W A R K

State: C A

ZIP Code: 9 4 5 6 0 -

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (last): M O R G A N

(first): C U R T I S

Job Title: P R E S I D E N T

Phone Number (area code and number): 4 1 5 - 7 9 5 - 4 4 0 0

VI. Facility Contact Address (See Instructions)

A. Contact Address Location: X

Mailing: X

B. Street or P.O. Box: 6 8 8 0 S M I T H A V E N U E

City or Town: N E W A R K

State: C A

ZIP Code: 9 4 5 6 0 -

...pe with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No 2050-0034 Expires 12-31-91
GSA No 0246-EPA-OT

...O. Number (enter from page 1) | Secondary ID Number (enter from page 1)

C A D 9 8 0 8 8 7 4 1 S

VII. Operator Information (see instructions)

Name of Operator

E V E R G R E E N O I L I N C

Street or P.O. Box

6 8 8 0 S M I T H A V E N U E

City or Town | **State** | **ZIP Code**

N E W A R K | C A | 9 4 5 6 0 -

Phone Number (area code and number)

4 1 5 - 7 9 5 - 4 4 0 0

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed (Month, Day, Year)

VIII. Facility Owner (see instructions)

A. Name of Facility's Legal Owner

E V E R G R E E N O I L I N C

Street or P.O. Box

6 8 8 0 S M I T H A V E N U E

City or Town | **State** | **ZIP Code**

N E W A R K | C A | 9 4 5 6 0 -

Phone Number (area code and number)

4 1 5 - 7 9 5 - 4 4 0 0

B. Owner Type: P

C. Change of Owner Indicator: Yes [ ] No [X]

Date Changed (Month, Day, Year)

IX. SIC Codes (4-digit, in order of significance)

Primary	Secondary
2992 (description) PETROLEUM OILS RE-REFINING	(description)
Secondary	**Secondary**
2860 (description) INDUSTRIAL ORGANIC CHEMICAL TREATMENT	(description)

X. Other Environmental Permits (see instructions)

A. Permit Type (enter code)	B. Permit Number	C. Description
	RESOLUTION 9700	CONDITIONAL USE PERMIT, NEWARK, CA
	PLANT NO 11900	BAY AREA AIR QUAL. MGMT. DISTRICT
	268	POTW - UNION SANITARY DISTRICT

EPA I.D. Number (enter from page 1): C A D 9 8 0 8 8 7 4 1 8

Secondary ID Number (enter from page 1):

XI. Nature of Business (provide a brief description)

Evergreen Oil Inc. is primarily a waste oil blending and re-refining operation producing fuel oils and lubricating oils as products. The facility will also handle ethylene glycol, spent non-halogenated solvents and spent halogenated solvents. The ethylene glycol and non-halogenated solvents will be stored, treated and transferred. The halogenated solvents will be stored and transferred and may be treated in the future.

XII. Process - Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process unit.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	DISPOSAL:	
D79	INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY
D80	LANDFILL	ACRE-FEET OR HECTARE-METER
D81	LAND APPLICATION	ACRES OR HECTARES
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	STORAGE:	
S01	CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS
S02	TANK	GALLONS OR LITERS
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS
	TREATMENT:	
T01	TANK	GALLONS PER DAY OR LITERS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR
T04	OTHER TREATMENT (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
GALLONS PER HOUR	E
GALLONS PER DAY	U
LITERS	L
LITERS PER HOUR	H
LITERS PER DAY	V
SHORT TONS PER HOUR	D
METRIC TONS PER HOUR	W
SHORT TONS PER DAY	N
METRIC TONS PER DAY	S
POUNDS PER HOUR	J
KILOGRAMS PER HOUR	R
CUBIC YARDS	Y
CUBIC METERS	C
ACRES	B
ACRE-FEET	A
HECTARES	Q
HECTARE-METER	F
BTU's PER HOUR	K

EPA I.D. Number (enter from page 1): C A D 9 8 0 8 8 7 4 1 8

Secondary ID Number (enter from page 1):

XII. Process – Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY	
X 1	S 0 2	600	G	0 0 2		
X 2	T 0 3	20	E	0 0 1		
1	S 0 1	8250	G	1 5 0		drums
2	T 0 4	54,800	U	0 0 1		oily waste processing
3	T 0 4	2470	U	0 0 1		et. glycol treatment
4	T 0 1	1100	U	0 0 1		hc. solvent treatment
5	T 0 1	1400	U	0 0 1		xhc. solvent treatment
6	S 0 2	40,000	G	0 0 2		solvent storage
7	S 0 2	1,400,000	G	0 3 6		oil storage
8						
9						
10						
11						
12						

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in Item XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. TREATMENT PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
	T 0 4	54,800	U	0 0 1	Re-refining lubricating and fuel oils and fuel blending
	T 0 4	2470	U	0 0 1	Treatment of ethylene glycol
	T 0 4				
	T 0 4				

EPA I.D. Number (enter from page 1)

C	A	D	9	8	0	8	8	7	4	1	8

Secondary ID Number (enter from page 1)

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item XIV-D(1).
3. Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS (1) PROCESS CODES (enter)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

EPA I.D. Number (enter from page 1) C A D 9 8 0 8 8 7 4 1 8

Secondary ID Number (enter from page 1)

XIV. Description of Hazardous Wastes (continued)

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES (1) PROCESS CODES (enter)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F001	1850	T	S01 S02	CA Codes 211, 213
2	F002			S01 S02	included in F001 above
3	F003			S01 S02	included in F001 above
4	D001	1380	T	S01 S02 T04	
5	D018	83,400	T	S02 T01 T04	
6	D019		T	S01 S02	included in Line 5 above
7	D022		T	S01 S02	
8	D027		T	S01 S02	
9	D028		T	S01 S02	
10	D029		T	S01 S02	
11	D030		T	S01 S02	
12	D032		T	S01 S02	
13	D033		T	S01 S02	
14	D008		T	S01 S02 T04	
15	D035		T	S01 S02	
16	D036		T	S01 S02	
17	D005		T	S01 S02 T04	
18	D007		T	S01 S02 T04	
19	D039		T	S01 S02	
20	D040		T	S01 S02	
21	D041		T	S01 S02	
22	D042		T	S01 S02	
23	NONE	83,400	T	S02 T01 T04	CA Codes 221,222,223,241
24	NONE	3800	T	S01 S02 T01	CA Code 134
25					
26					
27					
28					
29					
30					
31					
32					
33					

Please print or type with ELITE type (12 characters per inch) within the shaded areas only.

EPA I.D. Number (enter from page 1): CAD980887418

Secondary ID Number (enter from page 1):

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line Number	Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Owner Signature: C E Morgan — Date Signed: Oct 9, 1990

Name and Official Title (type or print): - Curtis Morgan

Operator Signature: C E Morgan — Date Signed: Oct 9, 1990

Name and Official Title (type or print): Curtis Morgan

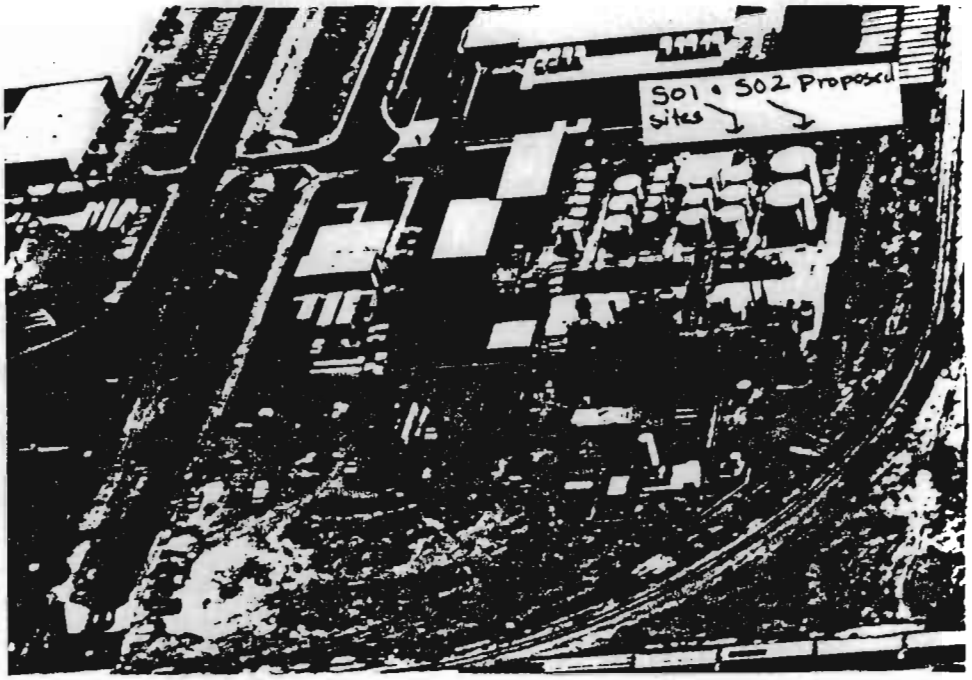
XIX. Comments

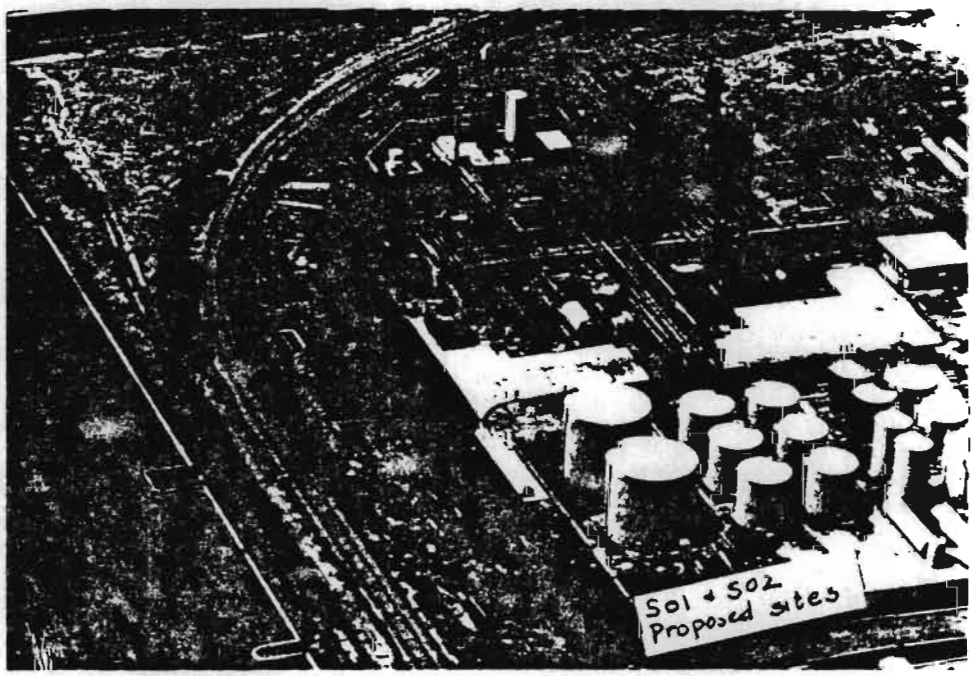
Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

Evergreen Oil, Inc.
Newark,California
October 10, 1990

Part A Form
CAD980887418
1396T2

XVII. PHOTOGRAPHS OF THE FACILITY





Attachment E

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EVERGREEN OIL, INC.

EPA ID NO. CAD980887418

FORM **PS**

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

WASTE TREATMENT, DISPOSAL, OR RECYCLING PROCESS SYSTEMS

INSTRUCTIONS: Read the detailed instructions beginning on page 30 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste treatment, disposal or recycling system description
Instruction Page 36

Re-refining of California Regulated waste oil by vacuum distillation with a hydro-finishing polish.

B. System type Page 36	C. Regulatory status Page 36	D. Operational status Page 37	E. Unit types Page 37
M032	08	01	01

Sec. II

A. 1989 influent quantity, Instruction Page 38

	Quantity	UOM	Density
Total	11598213	5	7.5
RCRA	NA		[X] 1 lbs/gal ☐ 2 sg

B. Maximum operational capacity, Page 39

	Quantity
Total	12000000
RCRA	NA

C. 1989 liquid effluent quantity, Page 40

	Quantity	UOM	Density
Total	23000	5	8.0
RCRA	NA		[X] 1 lbs/gal ☐ 2 sg

D. 1989 solid/sludge residual quantity, Page 41

	Quantity	UOM	Density
Total	0		.
RCRA	NA		☐ 1 lbs/gal ☐ 2 sg

E. Limitations on capacity Page 41	F. Commercial availability code Page 41	G. Percent capacity commercially available Page 42
1. 02 2. 07 3.	4	100 %

Sec. III

A. Planned change in maximum operational capacity, Instruction Page 42

[X] 1 Yes (CONTINUE TO BOX B)
☐ 2 No (THIS FORM IS COMPLETE)

B. New maximum operational capacity, Page 42

	Quantity	UOM
Total	12000000	5
RCRA		

C. Planned year of change Page 43	D. Future commercial availability code Page 43	E. Percent future capacity commercially available Page 43
1991	4	100 %

Comments:

OMB# 2050-0024 Expires 3-31-92

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME EVERGREEN OIL, INC.

EPA ID NO. GAD980874118

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM **IC**

IDENTIFICATION AND CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the 1989 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box ☒ in items A, B, D, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 7.

A. EPA ID No. Same as label ☐ or → GAD980874118

B. Site/company name Same as label ☐ or → EVERGREEN OIL, INC.

C. Has the site name associated with this EPA ID changed since 1987? ☐ 1 Yes ☒ 2 No

D. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label ☐ or → 6880 SMITH AVE.

E. City, town, village, etc. Same as label ☐ or → NEWARK

F. County: ALAMEDA

G. State Same as label ☐: CA

H. Zip Code Same as label ☐: 94560-

SEC. II Mailing address of site. Instruction page 7.

A. Is the mailing address the same as the location address? ☒ 1 Yes (SKIP TO SEC. III) ☐ 2 No (COMPLETE SEC. II)

Number and street name of mailing address

C. City, town, village, etc.

D. State

E. Zip Code

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 7.

A. Please print: Last name	First name	M.I.	B. Title	C. Telephone
KEENE	SUSAN	L.	ENVIRONMENTAL MANAGER	415 795-4400 Extension

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 8.

A.	B.	C.	D.
2992			

SEC. V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Number of form pages submitted: Form IC 2; Form GM 4; Form WR 2; Form PS 1

B. Please print: Last name	First name	M.I.	C. Title
KEENE	SUSAN	L.	ENVIRONMETAL MANAGER

Signature: Susan L. Keene

D. Date of signature: 04 (MO.) 13 (DAY) 90 (YR.)

Sec. VI Generator Status

A. 1989 generation (CHECK ONE BOX BELOW)
Instruction page 8

- [ ] 1 No (CONTINUE TO BOX B)
- [ ] 2 LQG
- [ ] 3 SQG
- [ ] 4 CESQG

(SKIP TO SEC. VII)

B. Reason for not generating (CHECK ALL THAT APPLY)
Page 10

- [X] 1 Never generated
- [ ] 2 Out of business
- [X] 3 Only excluded or delisted waste
- [ ] 4 Only non-hazardous waste
- [ ] 5 Periodic or occasional generator
- [ ] 6 Waste minimization activity
- [ ] 7 Other (SPECIFY IN COMMENTS)

Sec. VII On-Site Waste Management Status

A. Storage
Instruction page 11

[1]

B. RCRA treatment, recycling, or disposal
Page 11

[1]

C. RCRA-exempt treatment, recycling, or disposal
Page 12

[3]

Sec. VIII Waste Minimization Activity during 1988 or 1989

A. Did this site begin or expand a source reduction activity during 1988 or 1989?
Instruction page 12

- [ ] 1 Yes
- [X] 2 No

B. Did this site begin or expand a recycling activity during 1988 or 1989?
Page 13

- [X] 1 Yes
- [X] 2 No

C. Did this site conduct a source reduction or recycling opportunity assessment during 1988 or 1989?
Page 13

- [ ] 1 Yes
- [X] 2 No

D. What factors have limited this site from initiating new source reduction activities during 1988 or 1989?
(CHECK ALL THAT APPLY)
Page 13

- [ ] 01 No factors have limited new source reduction activities.
- [ ] 02 Insufficient capital to install new source reduction equipment or implement new source reduction practices.
- [ ] 03 Lack of technical information on source reduction techniques applicable to the specific production processes.
- [ ] 04 Source reduction is not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] 05 Concern that product quality may decline as a result of source reduction.
- [ ] 06 Technical limitations of the production processes.
- [X] 07 Permitting burdens.
- [X] 08 Other (SPECIFY IN COMMENTS)

E. What factors have limited this site from initiating new on-site or off-site recycling activities during 1988 or 1989?
(CHECK ALL THAT APPLY)
Page 13

- [ ] 01 No factors have limited new recycling activities.
- [X] 02 Insufficient capital to install new recycling equipment or implement new recycling practices.
- [ ] 03 Lack of technical information on recycling techniques applicable to this site's specific production processes.
- [ ] 04 Recycling not economically feasible: cost savings in waste management or production will not recover the capital investment.
- [ ] 05 Concern that product quality may decline as a result of recycling.
- [ ] 06 Requirements to manifest wastes inhibit shipments off site for recycling.
- [ ] 07 Financial liability provisions inhibit shipments off site for recycling.
- [ ] 08 Technical limitations of product processes inhibit shipments off site for recycling.
- [ ] 09 Techical limitations of production processes inhibit on-site recycling.
- [ ] 10 Permitting burdens inhibit recycling.
- [ ] 11 Lack of permitted off-site recycling facilities.
- [ ] 12 Unable to identify a market for recyclable materials.
- [ ] 13 Other (SPECIFY IN COMMENTS)

Comments: Sec. VIII, BoxD: Evergreen is A TSDF that is not directly in control of the sources generating the waste.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME EVERGREEN OIL, INC.

EPA ID NO. C A D 9 8 0 8 8 7 4 1 8

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description Instruction Page 15: COMBUSTIBLE WASTE PETROLEUM OIL FROM INDUSTRIAL & AUTOMOTIVE HYDRAULIC USES, CONTAMINATED WITH GREATER THAN 1000 ppm HALOGENATED SOLVENTS. MIXTURE OF OIL, WATER, HALOGENATED SOLVENTS.

B. EPA hazardous waste code Page 15	C. State hazardous waste code Page 16
F 0 0 1 / F 0 0 2 / N A / N A	2 2 1 / N A

D. SIC code Page 16	E. Source code Page 16	F. Form code Page 16	G. Origin Page 16
7 5 3 8	A 5 4	B 2 0 6	Code 2 / System type M N A

H. TRI constituent Page 17	I. CAS numbers Page 17
1	1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1988 Instruction Page 17	B. Quantity generated in 1989 Page 17	C. UOM Page 18	D. Density Page 18	E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? Page 18
N A	1 3 5 4 2 4	5	7 . 5 [X] 1 lbs/gal [ ] 2 sg	[ ] 1 Yes (CONTINUE TO SYSTEM 1) [X] 2 No (SKIP TO SEC. III)

SYSTEM 1		SYSTEM 2	
System type Page 18	Quantity treated, disposed or recycled in 1989 Page 18	System type Page 18	Quantity treated, disposed or recycled in 1989 Page 18
M		M	

Sec. III

A. Was this waste shipped off site? Instruction Page 19 [X] 1 Yes (CONTINUE TO BOX B) [ ] 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped Instruction Page 19	C. System type Page 19	D. Total quantity shipped in 1989 Page 19
Site 1	C A T 0 8 0 0 3 1 6 2 8	M 0 5 1	8 0 0 5 2
Site 2	K S D 9 8 0 6 3 3 2 5 9	M 0 5 1	5 5 3 7 2

Sec. IV

A. Waste minimization results in 1989 Instruction Page 20 [ ] 1 Yes (CONTINUE TO BOX B) [ ] 2 No (THIS FORM IS COMPLETE)

B. Activity Page 21	C. Other effects Page 21	D. Quantity recycled in 1989 due to new activities Page 21	E. Activity/Production Index Page 21	F. Source Reduction Quantity Page 22
W 0 2 / W / W / W	[X] 1 Yes [ ] 2 No	1 3 5 4 2 4	N A	N A

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EVERGREEN OIL, INC.

EPA ID NO.: CAD980818714 18

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): TOXIC ETHYLENE GLYCOL SOLUTION FROM AUTOMOTIVE COOLING SYSTEMS; MIXTURE OF ANTIFREEZE AND WATER.

B. EPA hazardous waste code (Page 15)	C. State hazardous waste code (Page 16)
N/A N/A N/A N/A	135 N/A

D. SIC code (Page 16)	E. Source code (Page 16)	F. Form code (Page 16)	G. Origin (Page 16)
7538	A69	B2017	Code 2; System type MN/A

H. TRI constituent (Page 17)	I. CAS numbers (Page 17)
1	1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in 1988 (Instruction Page 17)	B. Quantity generated in 1989 (Page 17)	C. UOM (Page 18)	D. Density (Page 18)	E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 18)
N/A	142962	5	8.0 [X] 1 lbs/gal [ ] 2 sg	[ ] 1 Yes (CONTINUE TO SYSTEM 1) [X] 2 No (SKIP TO SEC. III)

SYSTEM 1		SYSTEM 2	
System type (Page 18)	Quantity treated, disposed or recycled in 1989 (Page 18)	System type (Page 18)	Quantity treated, disposed or recycled in 1989 (Page 18)
M		M	

Sec. III

A. Was this waste shipped off site? (Instruction Page 19) [ ] 1 Yes (CONTINUE TO BOX B) [ ] 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in 1989 (Page 19)
Site 1	CAD009452657	M085	1040513
Site 2	CAT080013352	M124	3819019

Sec. IV

A. Waste minimization results in 1989 (Instruction Page 20) [X] 1 Yes (CONTINUE TO BOX B) [ ] 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W012 W W W W	[ ] 1 Yes [X] 2 No	142962	N/A	N/A

Comments: Sec. 1, Box E: Waste generated from antifreeze changes in auto repair shops.
Sec. 1, Box F: Toxic ethylene glycol, aqueous solution.

Sec III, Box C: Use distillation to separate water from ethylene glycol

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EVERGREEN OIL, INC.

EPA ID NO.: C A D 9 8 0 8 8 7 4 1 8

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 16): OILY WATER, HAZARDOUS WASTE LIQUID FROM AUTOMOTIVE INDUSTRY, OIL CONTAMINATED WITH GREATER THAN 15 % WATER.

B. EPA hazardous waste code (Page 18)	C. State hazardous waste code (Page 18)
N A / N A / N A / N A	2 2 1 / N A

D. SIC code (Page 18)	E. Source code (Page 18)	F. Form code (Page 18)	G. Origin (Page 18)
7 5 3 8	A 6 9	B 2 0 5	Code 2 / System type M / N A

H. TRI constituent (Page 17)	I. CAS numbers (Page 17)
1	1. ____-__-_ 2. ____-__-_ 3. ____-__-_ 4. ____-__-_ 5. ____-__-_

Sec. II

A. Quantity generated in 1988 (Instruction Page 17)	B. Quantity generated in 1989 (Page 17)	C. UOM (Page 18)	D. Density (Page 18)	E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 18)
N A	6 8 1 9 6 8	5	8 . 0	☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)
			☒ 1 lbs/gal ☐ 2 sg	

SYSTEM 1		SYSTEM 2	
System type (Page 18)	Quantity treated, disposed or recycled in 1989 (Page 18)	System type (Page 18)	Quantity treated, disposed or recycled in 1989 (Page 18)
M		M	

Sec. III

A. Was this waste shipped off site? (Instruction Page 18) ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in 1989 (Page 18)
Site 1	C A D 9 8 0 8 8 3 1 7 7	M 0 3 2	6 8 1 9 6 8
Site 2		M	

Sec. IV

A. Waste minimization results in 1989 (Instruction Page 20) ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W 0 2 / W / W / W	☐ 1 Yes ☐ 2 No	6 8 1 9 6 8	N A .	N A

Comments: Sec. 1, Box E: Rainwater, washwater, etc. contaminated with smallamounts of oil. Typically 80 % water or greater.
Sec. III, Box C: Centrifugal separation of oil and water.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME EVERGREEN OIL, INC.

EPA ID NO. CAD980818714

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 18): NICKEL-MOLYBDEUM CATALYST FROM HYDROFINISHING PROCESS IN WASTE OIL REFINERY, CATALYST IS OIL CONTAMINATED.

B. EPA hazardous waste code (Page 18): NA | NA | NA | NA

C. State hazardous waste code (Page 18): 162 | NA

D. SIC code (Page 18): 2992

E. Source code (Page 18): A36

F. Form code (Page 18): B409

G. Origin (Page 18): Code 3 | System type M032

H. TPI constituent (Page 17): 1

I. CAS numbers (Page 17): 1. | 2. | 3. | 4. | 5.

Sec. II

A. Quantity generated in 1988 (Instruction Page 17): 50216

B. Quantity generated in 1989 (Page 17): 0

C. UOM (Page 18): 1

D. Density (Page 18): . ☐ 1 lbs/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 18): ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

SYSTEM 1

System type (Page 18): M

Quantity treated, disposed or recycled in 1989 (Page 18):

SYSTEM 2

System type (Page 18): M

Quantity treated, disposed or recycled in 1989 (Page 18):

Sec. III

A. Was this waste shipped off site? (Instruction Page 19) ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in 1989 (Page 18)
Site 1	NA	M NA	0
Site 2		M	

Sec. IV

A. Waste minimization results in 1989 (Instruction Page 20) ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W58 W W W W	☐ 1 Yes ☒ 2 No	NA	.	9

Comments: Sec. 1, Box F: Spent nickel-molybdeum catalyst.
Sec. IV, Box B: Changed pretreatment of waste oil feed through the catalyst, extending the catalyst life.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EVERGREEN OIL, INC.

EPA ID NO.: CADT980884741 8

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM **WR**

WASTE RECEIVED FROM OFF SITE

INSTRUCTIONS: Read the detailed instructions beginning on page 27 of the 1989 Hazardous Waste Report booklet before completing this form.

Waste 1

A. Description of hazardous waste (Instruction Page 27): Combustible waste petroleum oil from industrial & automotive hydraulic uses; mixture of lubricating oils & water.

B. EPA hazardous waste code (Page 28): NA NA NA NA

C. State hazardous waste code (Page 28): 221 NA

D. Off-site source EPA ID No. (Page 28): NA

E. Quantity received in 1989 (Page 28): 1159821 3

F. UOM (Page 28): 5

G. Density (Page 28): 7.5 ☒ 1 lbs/gal ☐ 2 sg

H. Waste form code (Page 28): B206

I. System type (Page 28): M032

Waste 2

A. Description of hazardous waste (Instruction Page 27): Combustible waste petroleum oil from industrial & automotive hydraulic uses; contaminated with greater than 1000 ppm halogenated solvents.

B. EPA hazardous waste code (Page 28): F001 F002 NA NA

C. State hazardous waste code (Page 28): 221 NA

D. Off-site source EPA ID No. (Page 28): ☐ Check if ID same as in Waste 1 or -> NA

E. Quantity received in 1989 (Page 28): 135421 4

F. UOM (Page 28): 5

G. Density (Page 28): 7.5 ☒ 1 lbs/gal ☐ 2 sg

H. Waste form code (Page 28): B206

I. System type (Page 28): M041

Waste 3

A. Description of hazardous waste (Instruction Page 27): Toxic ethylene glycol from automotive cooling systems; mixture of antifreeze and water.

B. EPA hazardous waste code (Page 28): NA NA NA NA

C. State hazardous waste code (Page 28): 135 NA

D. Off-site source EPA ID No. (Page 28): ☐ Check if ID same as in Waste 2 or -> NA

E. Quantity received in 1989 (Page 28): 142916 2

F. UOM (Page 28): 5

G. Density (Page 28): 8.0 ☒ 1 lbs/gal ☐ 2 sg

H. Waste form code (Page 28): B207

I. System type (Page 28): M085

Comments:

Waste 1, Box D: Collect oil from thousands of generators under the modified manifest procedure (which does not require EPA ID numbers).

Waste 1, Box I: Oil re-refined using vacuum distillation with a hydrofinishing polish.

Waste 2, Box D: Material is collected from thousands of generators.

Waste 3, Box D: Material is collected from thousands of generators.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: EVERGREEN OIL, INC.

EPA ID NO. CAD980887418

U.S. ENVIRONMENTAL PROTECTION AGENCY

1989 Hazardous Waste Report

FORM **WR**

WASTE RECEIVED FROM OFF SITE

INSTRUCTIONS: Read the detailed instructions beginning on page 27 of the 1989 Hazardous Waste Report booklet before completing this form.

Waste 1

Field	Entry
A. Description of hazardous waste (Instruction Page 27)	Hazardous waste liquid from automotive industry contaminated with greater than 15% water.
B. EPA hazardous waste code (Page 28)	NA / NA / NA / NA
C. State hazardous waste code (Page 28)	221 / NA
D. Off-site source EPA ID No. (Page 28)	NA
E. Quantity received in 1989 (Page 28)	681968
F. UOM (Page 28)	5
G. Density (Page 28)	8.0 [X] 1 lbs/gal [ ] 2 sg
H. Waste form code (Page 29)	B205
I. System type (Page 29)	M032

Waste 2

Field	Entry
A. Description of hazardous waste (Instruction Page 27)	
B. EPA hazardous waste code (Page 28)	
C. State hazardous waste code (Page 28)	
D. Off-site source EPA ID No. (Page 28)	[ ] Check if ID same as in Waste 1 or ->
E. Quantity received in 1989 (Page 28)	
F. UOM (Page 28)	
G. Density (Page 28)	. [ ] 1 lbs/gal [ ] 2 sg
H. Waste form code (Page 29)	B
I. System type (Page 29)	M

Waste 3

Field	Entry
A. Description of hazardous waste (Instruction Page 27)	
B. EPA hazardous waste code (Page 28)	
C. State hazardous waste code (Page 28)	
D. Off-site source EPA ID No. (Page 28)	[ ] Check if ID same as in Waste 2 or ->
E. Quantity received in 1989 (Page 28)	
F. UOM (Page 28)	
G. Density (Page 28)	. [ ] 1 lbs/gal [ ] 2 sg
H. Waste form code (Page 29)	B
I. System type (Page 29)	M

Comments: [illegible] oily water treated by centrifugal separation.

Attachment F

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *(Form designed for use on elite (12-pitch typewriter).*

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAC000518392 — Manifest Document No.
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
MIDAS Muffler
3833 N. McHenry
Modesto Ca
4. Generator's Phone (209) 527-0400

Inv# 202985

A. State Manifest Document Number 88166303
B. State Generator's ID

5. Transporter 1 Company Name: Evergreen Environmental Servs.
6. US EPA ID Number: CAD981069571
C. State Transporter's ID 107219
D. Transporter's Phone 800-975-5288

7. Transporter 2 Company Name: ODYSSEY TRANS
8. US EPA ID Number: CAD087210019
E. State Transporter's ID 202016
F. Transporter's Phone (216) 426-3901

9. Designated Facility Name and Site Address
HAZ/CONTROL INC.
731 RENZ LANE
Gilroy, Ca.
10. US EPA ID Number: CAD000628149
G. State Facility's ID CA0010628149
H. Facility's Phone 408-848-1470.

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE Petroleum oils, NOS, Combustable. X Liquid, NA 1270	001	TT	110	G	State 221 / EPA/Other F001/1008
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Oil, WATER less Than 3% Chlorinated Solvent
PROFILE AA06194

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
#1016-K3D980633259.
Wear Protective Clothing and Safety Gear
#9 alt TSDF - Systech Environ Corp. 66736
So. Cement Rd, Stedonia, KS
Emergency Response # 415-795-4400
#H (316) 378-4451
Emergency Contact - Kirk Haywood

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month Day Year
Jim WARD	Jim Ward	06 05 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Michael J Edwards	Michael J Edwards	06 06 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
DON LANG		06 12 91

FACILITY

19. Discrepancy Indication Space
~~#9 Alternate TSDF~~ ~~National Cement Co./Systech~~
~~SWT. NE OF I-5 OFF Rte 138~~
~~Lebec, CA 93243~~

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

88166303

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
: P.O. Box 3000, Sacramento, CA 95812

EVERGREEN ENVIRONMENTAL SERVICES

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC.

6880 SMITH AVE., NEWARK, CA 94560
(800) 972-5284 EPA ID# CAD980695761

INVOICE 193015

DATE: 6-18-91

CUSTOMER	JOB LOCATION	BILLING INFORMATION	
NAME	City of Los Altos	NAME	P. O. #
ADDRESS	707 fremont Ave	ADDRESS	CUSTOMER NO.
CITY STATE ZIP CO	Los Altos Ca 94024	CITY STATE ZIP CO	PHONE NO. (415) 948 0482

PLEASE PAY FROM THIS INVOICE CAL000042711 **TERMS: NET 7 DAYS**

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS COMBUSTIBLE LIQUID NA1270	90609229	50	225	112 50
WASTE ANTIFREEZE NONCOMBUSTIBLE LIQUID UN1132				
HAZARDOUS WASTE LIQUID ORM-E UN9189				
WASTE OIL WITH > 1000 PPM HALOGENS				
OT				

TSDF EVERGREEN OIL, INC. (415) 795-4400
6880 Smith Ave EPA ID # CAD980887418
Newark, CA

TOTAL CHARGES 112-50

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT.

Ray Ramon Garcia

DRIVER ROUTE # DRIVER SIGNATURE GENERATOR'S SIGNATURE

IN CASE OF AN EMERGENCY OR SPILL

and are classified, packed, marked and labeled/placarded and are in all respects in proper condition for transport according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JOHN G. LOVELL — Signature — Month Day Year: 6 18 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: RAMON GARCIA — Signature: Ramon Garcia — Month Day Year: 6 18 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JIM MCCALL — Signature — Month Day Year: 06 20 91

FACILITY

19. Discrepancy Indication Space
~~#9 Alternate TSDF~~ National Cement Co/System
5 mi. east of I-5 off Rte 138
Lebec, CA 93243

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Month Day Year

his Line

DHS 8022 A
EPA 8700—22
(Rev. 6-89) Previous editions are

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *Form designed for use on elite (12-pitch typewriter).*

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAL000K427111 — Manifest Document No. 09829
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number 90609229

3. Generator's Name and Mailing Address: City of Los Altos 707 Fremont Ave Los Altos 94024
4. Generator's Phone (415) 948-0482
B. State Generator's ID

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES
6. US EPA ID Number: CAD980695761
C. State Transporter's ID [illegible]
D. Transporter's Phone (800) 972-5284

7. Transporter 2 Company Name: NUBULK SERVICES
8. US EPA ID Number: PAD911046006
E. State Transporter's ID 106543
F. Transporter's Phone (415) 887-0537

9. Designated Facility Name and Site Address:
HAZ/CONTROL INC.
731 Renz Lane
Gilroy, CA
10. US EPA ID Number: CAD000628149
G. State Facility's ID CAD000628149
H. Facility's Phone (408) 848-1470

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	TT	50	G	State 221; EPA/Other F001/D008
b.					State; EPA/Other
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above
Oil, water less than 2% chlorinated solvents

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
PROFILE AA06194
Wear Rubber Gloves
#9 ALTERNATE TSDF: SYSTECH ENVIRON. CORP.
SO CEMENT RD.
FREDONIA, KS. 66736
#G-#10-KSD980633259
#H-(316)378-4451

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JOHN G. LOVELL — Signature: [signature] — Month Day Year: 6 18 91

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: RAMON GARCIA — Signature: Ramon Garcia — Month Day Year: 6 18 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JIM MCCALL — Signature: — Month Day Year: 06 20 91

19. Discrepancy Indication Space
~~#9 Alternate TSDF~~ National Cement Co/Systech
5 mi. east of I-5 off Rte 138
Lebec, CA 93243

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

90609229

DHS 8022 A
EPA 8700—22
(Rev. 6-89) Previous editions are

his Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

EVERGREEN ENVIRONMENTAL SERVICES

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC.

6880 SMITH AVE., NEWARK, CA 94560
(800) 972-5284 EPA ID# CAD980695761

INVOICE 193014

DATE: 6-18-91

CUSTOMER	JOB LOCATION	BILLING INFORMATION	
	NAME: Nat'l Semi Conductor	NAME	P. O. #: 016850-01
	ADDRESS: 2900 Semi Conductor	ADDRESS	CUSTOMER NO.
	CITY: Santa Clara STATE: ZIP: 95052 CO:	CITY STATE ZIP CO	PHONE NO.: (408) 721 5568

PLEASE PAY FROM THIS INVOICE CAD041472986 **TERMS: NET 7 DAYS**

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS COMBUSTIBLE LIQUID NA1270	9025290	~~200~~ 165	2.25	371.25
WASTE ANTIFREEZE NONCOMBUSTIBLE LIQUID UN1132				
HAZARDOUS WASTE LIQUID ORM-E UN9189				
WASTE OIL WITH > 1000 PPM HALOGENS *				
OTHER:				

TSDF EVERGREEN OIL, INC. (415) 795-4400
6880 Smith Ave EPA ID # CAD980887418
Newark, CA

TOTAL CHARGES 371.25

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT.

Ray — Ramon Garcia — Susan Keene

DRIVER ROUTE # DRIVER SIGNATURE GENERATOR'S SIGNATURE

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *(Form designed for use on elite (12-pitch typewriter).*

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD041972986 — Manifest Document No. 51290

2. Page 1 of 4 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Natl Semi-Conductor 2900 Semi Conductor Dr
Santa Clara, CA 95052 M/S 35-100

4. Generator's Phone (408) 721-5568

A. State Manifest Document Number: 90251290

B. State Generator's ID: HAHQ316-108045

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES
6. US EPA ID Number: CAD980695761
C. State Transporter's ID: 200698
D. Transporter's Phone: (800) 972-5284

7. Transporter 2 Company Name: NUBULK SERVICES
8. US EPA ID Number: PAD911046006
E. State Transporter's ID: 106543
F. Transporter's Phone: (415) 887-0537

9. Designated Facility Name and Site Address
HAZ/CONTROL INC.
731 Renz Lane
Gilroy, CA
10. US EPA ID Number: CAD000628149
G. State Facility's ID: CAD000628149
H. Facility's Phone: (408) 848-1470

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	TT	165	G	State 221 / EPA/Other F001/D008
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Oil, water less than 2% chlorinated solvents

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
PROFILE AA06194
Wear Protective Clothing and Safety Gear
#9 ALTERNATE TSDF: SYSTECH ENV. CORP
#10G-KSD980633259 50 CEMENT RD.
#H-(316)378-4451 FREDONIA, KS
66736

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume end toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
SUSAN KEENE	Susan Keene	6 18 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
RAMON GARCIA	Ramon Garcia	6 18 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
JIM MCCALL		06 20 91

FACILITY

19. Discrepancy Indication Space
~~#9 ALTERNATE TSDF~~ NATIONAL Cement Co. / Systech
5 mi. ~~EAST~~ OF I-5 off Rte. 138
LEBEC, CA 93243

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year

GENERATOR

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

90251290

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

EVERGREEN ENVIRONMENTAL SERVICES

A DIVISION OF CALIFORNIA OIL RECYCLERS, INC.

6880 SMITH AVE., NEWARK, CA 94560
(800) 972-5284 EPA ID# CAD980695761

INVOICE 204838

DATE: June 14 1991

CUSTOMER	JOB LOCATION	BILLING INFORMATION	
	NAME: Pacific Gas & Electric	NAME	P. O. #
	ADDRESS: 316 "L" St	ADDRESS: Same	CUSTOMER NO.: PGE061
	CITY: Davis STATE: Ca ZIP: 95616 CO:	CITY STATE ZIP CO	PHONE NO.: (916) 757-5855

PLEASE PAY FROM THIS INVOICE **TERMS: NET 7 DAYS**

PRODUCT	MANIFEST #	GALLONS	PRICE	AMOUNT
WASTE PETROLEUM OILS COMBUSTIBLE LIQUID NA1270				
WASTE ANTIFREEZE NONCOMBUSTIBLE LIQUID UN1132				
HAZARDOUS WASTE LIQUID ORM-E UN9189				
WASTE OIL WITH > 1000 PPM HALOGENS NA1270 (4000+)	902557	950	2.00	1900 00
OTHER:				

TSDF EVERGREEN OIL, INC. (415) 795-4400
6880 Smith Ave EPA ID # CAD980887418
Newark, CA

TOTAL CHARGES 1900 00

I CERTIFY THAT THE ABOVE AMOUNTS AND INFORMATION TO BE CORRECT.

1030 Bob Luck — Stephen E. Clayton

DRIVER ROUTE # DRIVER SIGNATURE — GENERATOR'S SIGNATURE

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *(Form designed for use on elite (12-pitch typewriter).*

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD981416205 — Manifest Document No. 90255781

2. Page 1 of — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: PACIFIC GAS & ELECTRIC, 316 "L" ST, DAVIS, CA 95616

4. Generator's Phone (916) 757-5865

A. State Manifest Document Number: 90255781

B. State Generator's ID:

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES — 6. US EPA ID Number: CAD980695761

C. State Transporter's ID: 104168

D. Transporter's Phone: (800) 972-5284

7. Transporter 2 Company Name: NUBULK SERVICES — 8. US EPA ID Number: PAD981046006

E. State Transporter's ID: 106543

F. Transporter's Phone: (415) 887-0537

9. Designated Facility Name and Site Address: HAZ/CONTROL INC., 731 Renz Lane, Gilroy, CA — 10. US EPA ID Number: CAD000628149

G. State Facility's ID: CAD000628149

H. Facility's Phone: (408) 848-1470

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	TT	958	G	State 221 / EPA/Other F001/D008
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above: Oil, water less than 2% chlorinated solvents

K. Handling Codes for Wastes Listed Above: a. ; b. ; c. ; d.

15. Special Handling Instructions and Additional Information
PROFILE #AA06194
Wear Protective Clothing and Safety Gear
#9 ALTERNATE TSDF: SYSTECH ENVIRON. CORP 50 CEMENT RD. FREDONIA, KS 66736
#1 H-(316)378-4451 #1 G-KSD980633259

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
Stephen E. Clayton	Stephen E. Clayton	10	16	91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
BOB QUICK	Bob Quick	10	16	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
JIM MCCALL				

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3000, Sacramento, CA 95812

WEIGHMASTER CERTIFICATE

THIS IS TO CERTIFY that the following described commodity was weighed, measured, or counted by a weighmaster, whose signature is on this certificate, who is a recognized authority of accuracy, as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the California Department of Food and Agriculture.

NATIONAL CEMENT COMPANY OF CALIFORNIA, INC.

LEBEC PLANT
(13 MILES N.E. OF GORMAN OFF HWY. 138)
LOS ROBLES, CALIFORNIA

SHORT FORM
THIS MEMORANDUM

No. 73291

DATE 6-5-91

CARRIER Cast of [illegible]

†DRIVER X [signature]

TRUCK LICENSE NO. [illegible]

TRAILER LICENSE NOS.

SOLD TO

NCCI

SHIP TO ADDRESS

† TRUCK SCHEDULE ARRIVAL

TRUCK NO.	†DRIVER NO.	†CUSTOMER NO.	†JOB NO.	†DRIVER ☐ ON ☒ OFF VEHICLE

WEIGHTS-LBS.		QUANTITY (TONS)	MATERIAL DESCRIPTION		
† GROSS	49880		Fuel # 9863		
† TARE	29360		Low		
† NET	20520		221		
			Fuel #2		

National Cement Company of California, Inc.
WEIGHMASTER

BY [signature]
DEPUTY

†IN PLANT | † START LOAD | †OUT PLANT

RECEIVED BY

X

DATE TIME

PERMANENT POST OFFICE ADDRESS OF SHIPPER
15821 Ventura Blvd., Suite 435
ENCINO, CA 91436-2935

† Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

NO. 4 MUST BE SUBMITTED WITH FREIGHT BILL

5. DELIVERY COPY

State Code : 221 223

Viscosity :

Recv. Volume : 2525 Gals

Recv. Weight : 20520 Lbs
Heat Capacity : 6600 BTUS/Lb

Comments: <30 PPM CADMIUM

UNLOADING COMMENTS:

Sched. Time In: 10:00
Actual Time In: 11:08
Time Out : 14:10

Tank No.(s): 3 (100%)

Comments: NO PROBLEMS

Total Loading Time: 0 hour(s), 0 minutes
SYSTECH Pump Time: 0 hour(s), 20 minutes

Delivered By: [signature]

Received By: [signature]

Invoice No:

Date: 06/05/91

Form Approved OMB No. 2050-0039 (Expires 8-30-91)

Please print or type. (Form designed for use on elite (12-pitch typewriter).) and Front of Page 7 Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAT000624866 Manifest Document No. 91191 9

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
HEWLETT PACKARD
[redacted] ROAD
SANTA ROSA, CA. 95401
4. Generator's Phone (707) 794-2167

A. State Manifest Document Number 88113121

B. State Generator's ID HAHQ3600607 7

5. Transporter 1 Company Name: EVERGREEN ENVIRO. SER.
6. US EPA ID Number: CAD980695761
C. State Transporter's ID 107163
D. Transporter's Phone (800) 972-5285

7. Transporter 2 Company Name: CA OIL RECYCLERS
8. US EPA ID Number: CAD980695761
E. State Transporter's ID
F. Transporter's Phone 415-795-4410

9. Designated Facility Name and Site Address
HAZ/CONTROL INC.
731 RENZ LANE
GILROY, CA. 95020
10. US EPA ID Number: CAD000628149
G. State Facility's ID CAD000628149
H. Facility's Phone (408) 848-1470

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE COMBUSTIBLE LIQUID, N.O.S. COMBUSTIBLE (OIL) D001 UN 1993	001	TT	00900	G	State 223 / EPA/Other D001
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
a) WATER > 99% CUTTING OIL < 1%

K. Handling Codes for Wastes Listed Above
a. 01 b. c. d.

15. Special Handling Instructions and Additional Information
EMERGENCY RESPONSE # (707) 794-3060 PROFILE# AAC6194
PLEASE WEAR PROTECTIVE CLOTHING, GLOVES AND EYE

16.

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: CHRIS ALMIND — Signature: Chris Almind — Month Day Year: 05 02 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: J.W. CANION — Signature: J W — Month Day Year: 05 02 91

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JOE BLASQUEZ — Signature: [signature] — Month Day Year: 06 04 91

FACILITY

19. Discrepancy Indication Space
ALT. TSDF #9: NATIONAL CEMENT CO/ SYSTECH
RECEIVED AT ALT. FACILITY LEBEC CA 93248
CAT080031628 (805) 248-6749

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: SHARON SOLIZ — Signature: Sharon Soliz — Month Day Year: 06 05 91

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7

88113121

US3

DHS 8022 A (1/88)
EPA 8700-22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

White: TSDF SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 3080, Sacramento, CA 95812

Form Approved OMB No. 2050—0039 (Expires 9-30-91)

Please print or type. *Form designed for use on elite (12-pitch typewriter).*

See Instructions on Back of Page 6 and Front of Page 7

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD980881718 Manifest Document No. 12460

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
EVERGREEN OIL, INC.
6880 SMITH AVENUE NEWARK, CA · 94560

4. Generator's Phone (415) 795-4400

A. State Manifest Document Number 90612460

B. State Generator's ID CAR936-921009

5. Transporter 1 Company Name EVERGREEN ENVIRONMENTAL SERVICES

6. US EPA ID Number CAD980857581

C. State Transporter's ID 1017230

D. Transporter's Phone (800) 972-3284

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
NATIONAL CEMENT CO./SYSTECH
5 mi. N.E. of I-5 off Rte 138
Lebec, CA 93243

10. US EPA ID Number CA1030031628

G. State Facility's ID CAT080031628

H. Facility's Phone (805) 249-0749

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOC, COMBUSTIBLE LIQUID, NA 1270 DISPOSAL CERTIFICATION	001	T	04176	G	State 221 EPA/Other F001 / F002
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

Systech Environmental Corporation certifies that the above waste(s), more specifically identified by reference to the waste manifest number set forth above, was/were managed at the location indicated above by burning such material in a cement kiln.

SYSTECH ENVIRONMENTAL CORPORATION

BY

J. Additional Descriptions for Materials Listed Above
Contaminated with greater than 1000 ppm halogens

K. Handling Codes for Wastes Listed Above
a. 01 b.
c. d.

15. Special Handling Instructions and Additional Information
WEAR RUBBER GLOVES
24 HOUR EMERGENCY RESPONSE # (415) 795-4400
☐ PROFILE # [illegible] XX A30950

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
LAURA CICHELLO	Laura Cichello	05	13	91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
FRED GRANUCCI		05	13	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Dan Smith		05	13	91

GENERATOR

TRANSPORTER

FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A
EPA 8700—22
(Rev. 6-89) Previous editions are obsolete.

Do Not Write Below This Line

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

Please print or type. *Form designed for use on elite (12-pitch typewriter).* Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAC000310645 — Manifest Document No. 71241 5

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Pacific Coast Trans
58 S Linden
So. San Francisco CA 94080

4. Generator's Phone (415) 875-9333

A. State Manifest Document Number 90612415

B. State Generator's ID 3114-3318-14

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES
6. US EPA ID Number: CAD980695761

C. State Transporter's ID 107207

D. Transporter's Phone (800) 972-5284

7. Transporter 2 Company Name: EVERGREEN ENVIRONMENTAL SERVICES
8. US EPA ID Number: CAD980695761

E. State Transporter's ID 107236

F. Transporter's Phone (415) 795-4400

9. Designated Facility Name and Site Address
NATIONAL CEMENT CO./SYSTECH
5 mi. N.E. of I-5 off Rte 138
Lebec, CA 93243
10. US EPA ID Number: CAT080031628

G. State Facility's ID CAT080031628

H. Facility's Phone (805) 248-6749

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	TT	00900	G	State 221 / EPA/Other F001 / F002
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Contaminated with greater than 1000 ppm halogens

K. Handling Codes for Wastes Listed Above
a. 01 b. c. d.

15. Special Handling Instructions and Additional Information
WEAR RUBBER GLOVES
24 HOUR EMERGENCY RESPONSE # (415) 795-4400
EMERGENCY CONTACT — KIRK HAYWARD
☒ PROFILE # AA06194 ☐ AA09504

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name	Signature	Month	Day	Year
Kathy Kwartz-Holm	Kathy Kwartz-Holm	05	01	91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
BRAD PIERCE		05	01	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
FRED GRANUCCI		05	12	91

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Dan Smith		05	31	91

Do Not Write Below This Line

EPA 8700-22 A
EPA 8700—22
(Rev. 6-89) Previous editions are obsolete.

COPIES WITHIN 30 DAYS

95812

GENERATOR

TRANSPORTER

FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

CT97196

Form Approved OMB No. 2050—0039 (Expires 9-30-91)

Please print or type. *(Form designed for use on elite (12-pitch typewriter).*

Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD981373157 — Manifest Document No. 55721 1

2 Page 1 of — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: PACIFIC GAS & ELECTRIC, 50 KENTUCKY, WOODLAND CA 95695

4. Generator's Phone (916) 666-1961

A. State Manifest Document Number: 90255771

B. State Generator's ID:

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES — 6. US EPA ID Number: CAD980695761

C. State Transporter's ID: 104168

D. Transporter's Phone: (800) 972-5284

7. Transporter 2 Company Name: EVERGREEN ENVIRONMENTAL SERVICES — 8. US EPA ID Number: CAD980695761

E. State Transporter's ID: 10T236

F. Transporter's Phone: (415) 795-4400

9. Designated Facility Name and Site Address: HAZ/CONTROL INC., 731 Renz Lane, Gilroy, CA — 10. US EPA ID Number: CAD000628149

G. State Facility's ID: CAD000628149

H. Facility's Phone: (408) 848-1470

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	T	3310	G	State 221 / EPA/Other F001/D008
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above: Oil, water less than 2% chlorinated solvents

K. Handling Codes for Wastes Listed Above: a. 01 b. c. d.

15. Special Handling Instructions and Additional Information: Wear Protective Clothing and Safety Gear

EMERGENCY RESPONSE # (415) 795-4400
EMERGENCY CONTACT - KIRK HAYWARD

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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GENERATOR — Printed/Typed Name: R. E. Cary — Signature: R. E. Cary — Month Day Year: 04 30 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: Bob Quick — Signature: Bob Quick — Month Day Year: 04 30 91

18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name: FRED GRANUCCI — Signature: Fred Granucci — Month Day Year: 05 1 91

FACILITY

19. Discrepancy Indication Space: #9 ALTERNATE TSDF SYSTECH 5 MI. N.W. OF I-5 OFF RTE. 138, LEBEC, CA 93243 — #10 - CAT080031628 "H" (805) 248-6749

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. — Printed/Typed Name: Dan Smith — Signature: Dan Smith — Month Day Year: 05 1 91

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

COPY TO DOHS WITHIN 30 DAYS
SACRAMENTO, CA 95812

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

90255771

SYSTECH ENVIRONMENTAL CORPORATION
P.O. Box 837, County Road 138
Lebec, CA 93243
(805)248-6749

Date: 05/13/91

MISC. GENERATORS/EVERGREEN ENV. SERV.
Attn: Todd Hutcheon
6880 Smith Avenue
Newark, CA 94560

Manifest Enclosed No: 3 MANIFESTS

Material received from: Misc/Evergreen
Newark CA

Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *Form designed for use on elite (12-pitch typewriter).*

See instructions on back of Page 6 and Front of Page 7

Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD982806741 — Manifest Document No. 90612460

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
EVERGREEN OIL, INC.
6880 SMITH AVENUE NEWARK, CA 94560
4. Generator's Phone (415) 795-4400

A. State Manifest Document Number 90612460
B. State Generator's ID HAH036-021009

5. Transporter 1 Company Name: EVERGREEN ENVIRONMENTAL SERVICES
6. US EPA ID Number: CAD982806581
C. State Transporter's ID 101236
D. Transporter's Phone (800) 972-5284

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
NATIONAL CEMENT CO./SYSTECH
5 mi. N.E. of I-5 off Rte 138
Lebec, CA 93243
10. US EPA ID Number: CAT080031628
G. State Facility's ID: CAT080031628
H. Facility's Phone (805) 248-6740

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE PETROLEUM OILS, NOS, COMBUSTIBLE LIQUID, NA 1270	001	TT	04176	G	State 221 / EPA/Other F001 / F002
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Contaminated with greater than 1000 ppm halogens

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
WEAR RUBBER GLOVES
24 HOUR EMERGENCY RESPONSE # (415) 795-4400
EMERGENCY CONTACT — KIRK HAYWARD
☐ PROFILE # AA06194 ☒ AA09504

16.
GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
LAURA CICHELLO	Laura Cichello	05	16	91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[illegible]	05	22	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

GENERATOR

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A
EPA 8700—22
(Rev. 6-89) Previous editions are obsolete.

Do Not Write Below This Line

YELLOW: GENERATOR RETAINS

Evergreen Oil, Inc.

Scale No.: № 8785

6880 Smith Avenue
Newark, CA 94560
(415) 795-4400

WEIGHED FOR: EVERGREEN OIL   ADDRESS: NEWARK, CA

PURCHASER DELIVERED TO: NATIONAL CEMENT / SYSTECH   ADDRESS: LEBECK, CA

COMMODITY: HOT OIL   B/L: 90612460

CORI

CARRIER

PRINT HERE TRUCK LIC. NO: 3/0- 911

PRINT HERE TRLR. LIC. NO: DP-59120

TRLR. LIC. NO: DT-83068

GROSS 68560

MAY 10,91

TARE 29440

NET WT 39,120

DEPUTY

DEPUTY

WEIGHMASTER'S CERTIFICATE OF WEIGHT AND MEASURE

This is to certify that the following described merchandise was weighed, measured, or counted by a public weighmaster, and his signature is a recognized authority of accuracy as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the Department of Food and Agriculture of the State of California.

Attachment G

Evergreen Oil

6880 Smith Ave.
Newark, CA 94560
(415) 795-4400

BILL OF LADING NUMBER

91-2173

ORDERED BY:	DELIVERED TO:
DIABLO PETROLEUM	MASONITE CORPORATION
ADDRESS:	**ADDRESS:**
3930 Pacheco Blvd.	300 Ford Road
CITY/STATE/ZIP CODE:	**CITY/STATE/ZIP CODE:**
Martinez, CA	Ukiah, CA 95482

ORDERED BY:	P. O. #	CARRIER:	DATE:	F.O.B.:
T. Penny	U42134	C.O.R.I	07-09-91	Ukiah, CA

GROSS GALLONS	PRODUCT DESCRIPTION	API GRAVITY	TEMP
	Petroleum Oil NOS. Non-Combustible Liquid		
	Light Neutral		
	Medium Neutral		
	Asphalt Flux		
***	Fuel Oil — Combustible Liquid NA 1993		

Laura Cichello

EVERGREEN OIL, INC.

CONSIGNEE

SCALE NO.:

RECEIVING TICKET NO.:

DRIVER SIGNATURE

TRUCK NOS.: _____

TRUCK LIC. NO.: _____

TRLR. LIC. NO.: _____

TRLR. LIC. NO.: _____

PUMP REQUIRED ☐ YES ☐ NO

SUB-HAULER BILL OF LADING NO:

WHITE: CONSIGNEE YELLOW: CARRIER PINK: ACCOUNTING GOLD: FILE

RECYCLED OIL SHIPMENT CERTIFICATION

Pursuant to Sections 25250.1(e) and 25250.18, Chapter 6.5, Division 20, Health and Safety Code, this form must be maintained with each shipment of recycled oil or exempt oil from the recycling facility or generator to the shipment's destination. Use of this form fulfills this requirement. This form or a copy of this form must be kept for three years by the person certifying the shipment and by the transporter. These forms are subject to audit and verification by the Department or the California Waste Management Board.

Instructions to complete this form are on the reverse. Please print or type.

1. SHIPMENT

Cross Reference to Laboratory Analysis Data: 91190 Quantity of Oil Shipped: 6,200 (gallons)

Date of Shipment: 7/9/91 Invoice/Bill of Lading Number: 91-2173

2. RECYCLING FACILITY/GENERATOR

Name: EVERGREEN OIL, INC.

Address: 6880 SMITH AVENUE Contact: KIRK HAYWARD

NEWARK, CA 94560 Telephone Number: (415) 795-4400

3. TRANSPORTER

Name: EVERGREEN ENVIRONMENTAL SERVICES

Address: 6880 SMITH AVENUE Contact: KIRK HAYWARD

NEWARK, CA 94560 Telephone Number: (415) 795-4400

4. RECEIVING LOCATION (If more than one location, use space on reverse of this form.)

Name: MASONITE CORPORATION

Address: 300 FORD ROAD Contact:

UKIAH, CA Telephone Number: (707) 463-1170

5. CERTIFICATION *(check one box)*

☒ Recycling Facility ☐ Generator

I hereby declare under penalty of perjury that the oil in this shipment is recycled oil and has been tested and is in compliance with the standards and requirements of Article 13, Health and Safety Code.

Print/Type Name: CHUCK MOORE, JR.

Title: OPERATIONS MANAGER

Signature: [signature] Date: 7-9-91

Evergreen Oil, Inc.

Scale No.: № 10122

6880 Smith Avenue
Newark, CA 94560
(415) 795-4400

WEIGHED FOR: E O I ADDRESS: NEWARK

PURCHASER
DELIVERED TO: MASONITE CORP. ADDRESS: UKIAH CA

COMMODITY: FUEL B/L: 91-2173

CARRIER: CORI

PRINT HERE TRUCK LIC. NO: 710-811

PRINT HERE TRLR. LIC. NO:

TRLR. LIC. NO:

GROSS 77420

TARE 28540

NET WT 48880

DEPUTY

DEPUTY

WEIGHMASTER'S CERTIFICATE OF WEIGHT AND MEASURE

This is to certify that the following described merchandise was weighed, measured, or counted by a public weighmaster, and his signature is a recognized authority of accuracy as prescribed by Chapter 7 (commencing with Section 12700) of Division 5 of the California Business and Professions Code, administered by the Division of Measurement Standards of the Department of Food and Agriculture of the State of California.

.25¢

Evergreen Oil, Inc.

6880 Smith Ave.
Newark, CA 94560
(415) 795-4400

BILL OF LADING NUMBER

91-2173

ORDERED BY:	DELIVERED TO:
DIABLO PETROLEUM	MASONITE CORPORATION
ADDRESS:	ADDRESS:
3930 Pacheco Blvd.	300 Ford Road
CITY/STATE/ZIP CODE:	CITY/STATE/ZIP CODE:
Martinez, CA	Ukiah, CA 95482

ORDERED BY:	P. O. #	CARRIER:	DATE:	F.O.B.:
T. Penny	U42134	C.O.R.I	07-09-91	Ukiah, CA

GROSS GALLONS	PRODUCT DESCRIPTION	API GRAVITY	TEMP
	Petroleum Oil NOS. Non-Combustible Liquid		
	Light Neutral		
	Medium Neutral		
	Asphalt Flux		
6653 ***	Fuel Oil — Combustible Liquid NA 1993	28.9	60°

Laura Cichello
EVERGREEN OIL, INC.

CONSIGNEE

10122
SCALE NO.:

RECEIVING TICKET NO.:

DRIVER SIGNATURE

TRUCK NOS.: 710-811

TRUCK LIC. NO.:

TRLR. LIC. NO.:

TRLR. LIC. NO.:

PUMP REQUIRED ☐ YES ☐ NO

SUB-HAULER BILL OF LADING NO:

WHITE: CONSIGNEE YELLOW: CARRIER PINK: ACCOUNTING GOLD: FILE

Attachment H

SYSTECH ENVIRONMENTAL CORPORATION
P.O. Box 837, County Road 138
Lebec, CA 93243
(805)248-6749

01/02/91

RECEIVING TICKET

No. 9098

GENERATOR: EVERGREEN OIL, INC.
6880 Smith Ave.
Newark, CA 94560
Phone: (415)795-4400

Federal ID No: CAD980887418

HAULER: EVERGREEN OIL
6880 Smith Avenue
Newark, CA 94560
Phone: (415)795-4400

Federal ID No: CAD980695761

ANALYSIS COMMENTS:

Manifest No. : 90255633
Sample No. : EON
Waste Type : HAZ
EPA Waste Code: F001 F002

221

Chlorine : 1.0 %
Ash : 0.8 %
Water :
Lead : 100 ppm
Viscosity :

Received Volume : 5723 Gals

Received Weight 40620 Lbs
Heat Capacity 18500 BTUS/Lb

Comments: MATERIAL COMPATIBLE TO UNLOAD.CHROMIUM WAS <100PPM
CADMIUM WAS <30PPM.PH WAS 7.

UNLOADING COMMENTS:

Start Time : 12:00
Stop Time : 14:50
Time On : 16:13

Tank Volume: 2 (15 %) 1 (84 %)

Comments: NO UNLOADING PROBLEMS.

Total Loading Time: 0 hour(s), 0 minutes
SYSTECH Pump Time: 0 hour(s), 45 minutes

Delivered By: _____

Received By: _____

Invoice No: 8408 Date: 01/02/91

Attachment I

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704

August 13, 1990

Mr. Curtis E. Morgan
Evergreen Oil Inc.
6880 Smith Avenue
Newark, CA 94560

Dear Mr. Morgan:

EVERGREEN OIL INC., 6880 SMITH AVENUE, NEWARK, CA 94560, CAX 000 244 046

On June 1, 1990, this office received your letter in reference to the May 21, 1990 meeting you had with Howard Hatayama and myself. The meeting concerns Evergreen Oil, Inc. located in Newark, CA.

In your letter, the following issues were discussed:

1. Temporary storage of chlorine-containing used oil;

2. Permissible waste codes; and

3. Ethylene glycol variance.

Evergreen Oil's Hazardous Waste Facility Permit (Permit) issued on October 10, 1985 was based on the Part B Application submitted on July 25, 1985. After reviewing the Permit and Part B Application, the following statements are made in response to the issues you raised:

1. Evergreen Oil's Permit allows for acceptance and storage of waste oil containing chlorine up to 2,500 ppm or 0.25 percent by wt.

2. Evergreen Oil's Permit only allows waste code 221 (waste oil and mixed oil) to be stored and treated at their facility. The term "waste lubricating oils" does not include waste codes 222 (oil/waste separation sludge), 223 (unspecified oil-containing waste), and 241 (tank bottom waste). Classification of these waste codes is independent of water content present in used oil. Therefore, if Evergreen Oil wishes to accept waste codes 222, 223, and 241, these waste codes must be included in the Part B application.

3. The variance issued to Evergreen Oil for treatment and storage of ethylene glycol will expire on August 24, 1990. The Department can renew the variance based on the condition that ethylene glycol will be included as part of Evergreen

Oil's operation in the Part B application. The variance will only be valid while the Permit is undergoing review. A variance application is enclosed. An $8,000.00 fee must accompany the variance renewal application.

In addition, the Department understands that Evergreen Oil's Permit expires on October 10, 1990. Section 66388, Title 22, California Code of Regulations (CCR) requires that a new application be submitted 180 days before the expiration date of the effective permit. The renewal application should have been submitted to the Department on or before April 10, 1990. If an extension for the submission of the application is needed, the Department must receive a written request.

If you have any questions, please contact Daisy Lee at (415) 540-3933.

Sincerely,

Michael R. James

Michael R. James, Chief
Facility Permitting Unit
Region 2
Toxic Substances Control Program

Enclosure

cc: Deborah A. Sivas
Heller, Ehrman, White & McAuliffe
333 Bush Street
San Francisco, CA 94104-2878

Attachment J

ATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY
GEORGE DEUKMEJIAN, Governor
DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
2151 BERKELEY WAY, ANNEX 9
BERKELEY, CA 94704

INSPECTION REPORT

EVERGREEN OIL, INC. and
EVERGREEN ENVIRONMENTAL SERVICES
6880 Smith Avenue
Newark, CA 94560
(415) 795-4400
EPA ID#: CAD980887418 (EOI)
EPA ID#: CAD980695761 (EES)

Inspected by: Gregory Grunner

Dates of Inspection: March 21 & 22, 1990
Date of Report: April 20, 1990

I. Purpose

Scheduled Non-RCRA Non-Major Facility Inspection.

II. Representatives Present

Evergreen Oil/Evergreen Environmental Services:
Susan Keene, Environmental Manager
Todd Hutcheon, Operations Superintendent
Kirk Hayward, Vice-President

Alameda County Department of Environmental Health:
Tom Peacock, Senior Hazardous Materials Specialist

DAISY LEE X 3733 - PLRM
Department of Health Services/TSCP:
Gregory Grunner, Hazardous Materials Specialist
540-3817 — Richard Stewart, Hazardous Materials Specialist
Patricia Payne, Senior Hazardous Materials Specialist
Newark X 3871

III. Owner/Operator

Evergreen Holdings, located in Irvine, California, owns both Evergreen Oil, Inc. (EOI) and Evergreen Environmental Services (EES). EES is a transporter subsidiary of EOI.

IV. Background

According to Department of Health Services (Department) records, on October 10, 1985, the Department issued a Hazardous Waste Facility Permit to EOI for a waste oil recycling facility. The facility began operating and treating waste oil in 1986. EES, a registered hazardous waste hauler (DHS registration # 242), picks up waste oil and waste ethylene glycol (antifreeze) from small generators throughout northern California and transports them to the EOI/EES facility.

On October 16-20 and December 17-20, 1986, EOI was shut down by the City of Newark Fire Department as a result of complaints of odors coming from the sanitary sewer vents of neighboring facilities. On October 26, 1986, an explosion and fire occurred in EOI's asphalt flux tank. On October 29, EOI submitted an incident report to the Department which stated that the fire was caused by the ignition of flammable vapors by static electricity. On November 18, 1986, EOI submitted an addendum report describing the actions taken to correct the problems which may have caused the explosion.

On June 24, 1987, the Department conducted a facility inspection of EOI. The inspection revealed three violations of Title 22 of the California Code of Regulations concerning the failure of EOI to properly label containers of hazardous waste. A Report of Violation and Schedule for Compliance listing these violations was sent to EOI on September 3, 1987.

On August 24, 1988, the Department granted a Variance to EOI that permitted the facility to accept waste ethylene glycol in addition to waste oil.

V. General Description of Facility

The EOI/EES facility is located in an industrially-zoned area within the City of Newark in Alameda County. The property is bounded on all sides by other commercial and industrial facilities. See attachment 1 for a map of the EOI/EES facility.

The EOI/EES complex consists of one main building, several mobile temporary offices, and a large process area. The main building at the north end of the property contains administrative offices, an analytical lab, and a truck repair shop. The process area includes a bobtail and semi-trailer tanker truck off-loading area, an extensive tank farm area, a waste oil recycling refinery, and a small bermed generator drum storage area which contains both hazardous wastes and chemical product materials.

VI. Hazardous Waste Activity Description

According to the EOI Operation Plan, the facility receives, stores, and reprocesses used lubricating oils. According to Susan Keene, EOI also accepts waste ethylene glycol and transfers it by tanker truck to an off-site treatment facility within 144 hours, in accordance with the Variance granted by the Department.

EES is a registered hazardous waste hauler that operates 36 bobtail and semi-trailer tanker trucks stationed at the EOI/EES facility and at six off-site transfer stations located in Davis, Fresno, Redding, Ripon, Santa Maria, and Vallejo, California. EES transports used motor oil and waste ethylene glycol from small generators throughout northern California to the EOI/EES Newark facility for recycling or transfer. EES also does business under the name of California Oil Recyclers, Inc.

After waste oil is analytically tested in the in-house laboratory for the absence of hydrocarbon solvents, halogenated hydrocarbon compounds, and polychlorinated biphenyls (PCBs), it is pumped out from EES-owned or other tanker trucks. If sufficient levels of solvents, halogenated hydrocarbon compounds, or PCBs are detected in the incoming oil, the entire load is pumped to a stationary tank (tank 502) and then later pumped to another tanker truck and transferred to an off-site facility for treatment. Waste oil that is accepted for recycling is re-refined through a series of filtering, mixing, distillation, hydrofinishing, and fractionating steps.

The waste oil recycling process creates two weights of high-grade lubricating oils; a fuel-grade oil used for energy recovery; an asphalt flux used for the manufacture of roofing material; and hazardous wastes in the form of oily filter debris, spent aluminum oxide catalyst, and smaller quantities of miscellaneous wastes.

The oily filter debris is accumulated in 55-gallon drums and in a sheet metal box inside and near the filter cleaning area. Filled drums of oily filter debris or of other hazardous wastes are transferred by forklift to a bermed generator drum storage area located within the tank farm at the southeast corner of the facility (attachment 2: photos 14 & 15). When sufficient hazardous wastes have been accumulated, they are then shipped off-site by Chemical Waste Management, Inc. to their Kettleman Hills land disposal facility. Oily filter debris wastes are solidified before transportation by being mixed with a powdered rice hull ash. This is done either by hand with a shovel inside individual 55-gallon drums or with a small powered cement mixer directly on the floor of the drum storage area.

VII. Violations

EOI Violations:

1. California Health and Safety Code (H&SC), section 25123.3 (a)(3); Title 22, California Code of Regulations (Cal. Code Regs.), sections 66532 (a) and 66374 (a); Hazardous Waste Facility Permit number CAX000244046 (Permit) part II, section B and part III, section B.3.

EOI violated H&SC, section 25123.3 (a)(3); Title 22, Cal. Code Regs., sections 66532 (a) and 66374 (a); Permit part II, section B and part III, section B.3., in that on or about March 21, 1990, EOI, an off-site facility, stored and handled a hazardous waste not authorized in the EOI Hazardous Waste Facility Permit in containers or tanks.

Susan Keene stated that when EOI receives waste oil contaminated with greater that 1000 parts per million (ppm) halogenated hydrocarbon compounds, EOI pumps out the entire load of hazardous waste into a stationary tank (tank 502) and then later pumps the load to another tanker truck and transfers it to an off-site facility for treatment. According to EOI's manifest records, waste oil contaminated with greater that 1000 ppm halogenated hydrocarbon compounds have been transferred off-site in this manner at least 47 times between October 5, 1989 and March 31, 1990. The EOI Hazardous Waste Facility Permit, Operation Plan, and August 24, 1988 Variance permit EOI to accept, store, and treat only waste oil and waste ethylene glycol.

2. H&SC, section 25123.3 (d)(4); Title 22, Cal. Code Regs., section 66508 (a)(1)-(3).

EOI violated H&SC, section 25123.3 (d)(4) and Title 22, Cal. Code Regs., section 66508 (a)(1)-(3), in that on or about March 21, 1990, EOI failed to (1) adequately label all containers used for the satellite accumulation of hazardous waste with the initial date of accumulation and with the words "Hazardous Waste" or other words that clearly identify the contents of the container and (2) adequately label all nonstationary containers of hazardous waste with the date of accumulation; the words, "Hazardous Waste"; the composition and physical state of the waste; a statement which calls attention to the particular hazardous properties of the waste; and the name and address of the person producing the waste.

Satellite Accumulation:

Visual inspection revealed that one 55-gallon drum containing waste oil stored in the main building garage and one 55-gallon drum containing waste oil contaminated trash stored in the bobtail off-loading area were not labeled with accumulation dates (attachment 2: photos 1 & 2). Visual inspection also revealed that one 55-gallon drum containing waste oil and four 5-gallon containers containing waste oil and waste oil sludge stored in the bobtail off-loading area and four 5-gallon containers and one sheet metal box containing waste oil and oily filter debris stored in or and near the filter cleaning area were not affixed with any type of label (attachment 2: photos 2, 4, 5, 6, & 7).

Generator Storage:

Visual inspection revealed that two 55-gallon drums containing waste oil and oily filter debris stored in the drum storage area were not labeled with accumulation dates; 68 55-gallon drums containing waste oil and oily filter debris waste stored in the drum storage area were not labeled with a statement which identified the hazardous property of the waste and the name and address of the person producing the waste; and seven 55-gallon drums containing waste oil and oily filter debris or waste oil and water stored in the drum storage area were not affixed with any type of label (attachment 2: photos 18, 19, 20, 25, 26, 27, & 28).

3. H&SC, section 25123.3 (d)(6); Title 22, Cal. Code Regs., sections 67243 (a) and 66508 (a)(1).

EOI violated H&SC, section 25123.3 (d)(6) and Title 22, Cal. Code Regs., sections 67243 (a) and 66508 (a)(1), in that on or about March 21, 1990, EOI failed to keep all containers of hazardous waste closed except when it was necessary to add or remove the waste.

Satellite Accumulation:

Visual inspection revealed that one 55-gallon drum containing waste oil stored in the main building garage; two 55-gallon drums containing waste oil and waste oil contaminated trash stored in the bobtail off-loading area; four 5-gallon containers containing waste oil and waste oil sludge stored in the bobtail off-loading area; and four 5-gallon containers and one sheet metal box containing waste oil and oily filter debris stored in or and near the filter cleaning area were not kept closed except when it was necessary to add or remove the waste (attachment 2: photos 1, 2, 3, 4, 5, 6, & 7).

Generator Storage:

Visual inspection revealed that six 55-gallon drums containing waste oil, oily filter debris, and/or waste oil and water stored in the drum storage area were not kept closed except when it was necessary to add or remove the waste (attachment 2: photos 23, 24, 25, 26, 27, & 28).

4. Title 22, Cal. Code Regs., sections 66508 (a)(1), 67241, and 67243(b).

EOI violated Title 22, Cal. Code Regs., sections 66508 (a)(1), 67241, and 67243(b), in that on or about March 21, 1990, EOI handled and/or stored a container of hazardous waste in a manner which caused it to leak and failed to

transfer hazardous waste from a container not in good condition to a container that is in good condition.

Visual inspection revealed that one 55-gallon drum containing waste heat exchanger wash stored in the drum storage area was leaking hazardous waste on to the floor of the drum storage area (attachment 2: photos 21 & 22).

5. Title 22, Cal. Code Regs., sections 66508 (a)(1) and 67244.

EOI violated Title 22, Cal. Code Regs., sections 66508 (a)(1) and 67244, in that on or about March 21, 1990, EOI failed to, at least weekly, inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors.

On or about the day of the facility inspection, March 21, 1990, Susan Keene could not produce documentation for any EOI "weekly" inspection more recent than February 11, 1990 and confirmed that February 11, 1990 was the last time EOI personnel had inspected the areas listed on the EOI "Inspection Checklist Schedule: Weekly Inspection" log (attachment 3). Examination of the EOI inspection log revealed that the checklist did not list the generator drum storage area as an area to be inspected.

6. Title 22, Cal. Code Regs., sections 66374 (a) and 67105 (a)-(d); Permit, part III, section M.

EOI violated Title 22, Cal. Code Regs., sections 66374 (a) and 67105 (a)-(d) and Permit, part III, section M, in that on or about March 21, 1990, EOI failed to ensure that all facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Chapter 30 of Title 22, Cal. Code Regs.

Examination of EOI training records revealed that none of the EOI training courses required for hazardous waste personnel included any material covering the proper management of hazardous wastes. Susan Keene also could not produce any training records that documented whether or not Todd Hutcheon, the EOI Operations Superintendent, had taken any type of training at all. Dirk Dommaschek, a temporary worker who was working unsupervised in the drum storage area, stated that he had not received training of any kind other than instruction on how to solidify and mix the drummed oily filter debris with rice hull ash.

7. H&SC, section 25189.5 (a); Title 22, Cal. Code Regs., sections 67120 (a) and 66374 (a); Permit, part II, section G.6.a.

EOI violated H&SC, section 25189.5 (a), Title 22, Cal. Code Regs., section 67120 (a) and 66374 (a), and Permit, part II, section G.6.a., in that on or about March 21, 1990, EOI failed to maintain and operate their facility to minimize the possibility of any unplanned, sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Visual inspection revealed that the heavily oil-stained concrete pad which supports waste oil tanker trucks during washing and maintenance activities was visibly cracked in at least one place (attachment 2: photos 8, 9, 10, & 11) and that waste oil had been spilled on to exposed soil in at least two areas near the east end of the bobtail off-loading area (attachment 2: photos 12 & 13). Susan Keene stated that the dark stain in shown in photo 12 and that the absorbent-covered stain shown in photo 13 were spills of waste oil.

8. Title 22, Cal. Code Regs., sections 67123 (a) and 66508 (a)(4).

EOI violated Title 22, Cal. Code Regs., section 67123 (a) and 66508 (a)(4), in that on or about March 21, 1990, EOI failed to provide to all personnel involved in hazardous waste operations immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.

Visual inspection revealed that at the time of the facility inspection, Dirk Dommaschek, a temporary worker was working unsupervised in the drum storage area solidifying hazardous waste and was without access to an internal alarm, emergency communication device, or visual or voice contact with another EOI employee.

9. Title 22, Cal. Code Regs., section 67002 (b).

EOI violated Title 22, Cal. Code Regs., section 67002 (b), in that on or about March 21, 1990, EOI failed to adjust the facility Closure Cost Estimate for inflation and submit the adjusted cost estimate to the Department by March 1, 1990.

Examination of the facility Closure Cost Estimate on file with the Department's Financial Responsibility Unit revealed that EOI had not adjusted the facility Closure Cost Estimate for inflation and had not submitted the adjusted cost estimate to the Department by March 1, 1990.

EES Violations:

1. Title 22, Cal. Code Regs., section 66541 (a).

EES violated Title 22, Cal. Code Regs., section 66541 (a), in that on or about March 21, 1990, EES accepted hazardous waste with a Hazardous Waste Manifest that had not been accurately completed in accordance with section 66482, Title 22, Cal. Code Regs.

Examination of EES Hazardous Waste Manifests revealed that EES had at least nine times accepted for transport hazardous waste with Hazardous Waste Manifests that had been inaccurately completed with an incorrect company name and/or incorrect EPA identification number in the Transporter or Designated Facility section of the Hazardous Waste Manifest (attachment 4).

VIII. Observations

The following observations were made during the inspection of the EOI/EES facility on March 21 and 22, 1990. Upon arrival on the first day of the facility inspection (March 21), Richard Stewart, Pat Payne, Tom Peacock, and myself met with Ms. Susan Keene and briefly discussed the purpose of my inspection, the general facility layout, EOI's waste oil recycling process, and the tentative schedule for the day.

Following the opening interview, we toured the facility, beginning with EOI's in-house Analytical Laboratory where incoming waste oil is tested for hazardous constituents and for physical properties. Next, we entered the garage area, part of which is being remodeled for a planned laboratory expansion. I observed that one 55-gallon drum containing waste oil stored in the main building garage was not labeled with an accumulation date and was not kept closed (attachment 2: photo 1).

We then walked outside to the bobtail tanker truck off-loading area where waste oil is pumped out of tanker trucks to a mixing tank within the EOI tank farm. I observed that one 55-gallon drum containing waste oil contaminated trash stored in the bobtail off-loading area was not labeled with an accumulation date and that one 55-gallon drum containing waste oil contaminated trash stored in the bobtail off-loading area was not affixed with any label (attachment 2: photo 2). I also observed that both of these 55-gallon drums containing hazardous waste were not kept closed (attachment 2: photos 2 & 3).

We continued our inspection and walked to the east end of the bobtail off-loading area where tanker trucks are washed and/or maintained. Here I observed that four 5-gallon containers containing waste oil and waste oil sludge were not affixed with any labels and that all four containers were not kept closed (attachment 2: photo 4). I also observed that the heavily oil-stained concrete pad which supports waste oil tanker trucks during washing and maintenance activities was visibly cracked in at least one place (attachment 2: photos 8, 9, 10, & 11) and that waste oil had been spilled on to exposed soil in at least two areas near the east end of the bobtail off-loading area (attachment 2: photos 12 & 13). In response to my questions, Susan Keene confirmed that the dark stain shown in photo 12 and that the absorbent-covered stain shown in photo 13 were spills of waste oil.

We then approached the filter drain sump area. I observed that four 5-gallon containers and one sheet metal box containing waste oil and oily filter debris stored in the filter cleaning area were not affixed with any labels and that all of these containers were not kept closed (attachment 2: photos 5, 6, & 7). At this point in the inspection, we were joined by Mr. Todd Hutcheon.

Next, we were taken to the EOI generator drum storage area (attachment 2: photos 14 & 15). It contained a total of approximately 50 55-gallon drums containing hazardous waste and a number of other containers, some empty and some containing product materials. We inspected the area briefly and observed that Dirk Dommaschek, an EOI temporary worker, was working unsupervised and alone in the drum storage area solidifying hazardous waste without access to an internal alarm, emergency communication device, or visual or voice contact with another EOI employee. In response to questions, Mr. Dommaschek stated that he had not received training of any kind other than instruction on how to solidify and mix the drummed oily filter debris with rice hull ash. Mr. Dommaschek was in direct contact with hazardous waste, but was working without a shirt, protective clothing, or safety glasses.

After briefly inspecting the drum storage area, Todd Hutcheon, showed us the refinery and answered our questions regarding the EOI recycling process.

After a lunch break, Richard Stewart, Pat Payne, and myself returned to the drum storage area for a more detailed inspection. I observed that two 55-gallon drums containing waste oil and oily filter debris were not labeled with accumulation dates; 68 55-gallon drums containing waste oil and oily filter debris waste were not labeled with a

statement which identified the hazardous property of the waste and the name and address of the person producing the waste; and seven 55-gallon drums containing waste oil and oily filter debris and/or waste oil and water were not affixed with any labels (attachment 2: photos 18, 19, 20, 25, 26, 27, & 28). I also observed that six 55-gallon drums containing waste oil, oily filter debris, and/or waste oil and water stored in the drum storage area were not kept closed (attachment 2: photos 23, 24, 25, 26, 27, & 28). I also observed that one 55-gallon drum containing waste heat exchanger wash was leaking hazardous waste on to the floor of the drum storage area (attachment 2: photo 21 & 22).

On the second day of the facility inspection (March 22), Richard Stewart and myself met with Susan Keene and then began our records and paperwork review. While examining EOI/EES Hazardous Waste Manifests, I observed that EES had at least nine times accepted for transport hazardous waste with Hazardous Waste Manifests that had been inaccurately completed with an incorrect company name and/or incorrect EPA identification number in the Transporter or Designated Facility section of the Hazardous Waste Manifest (attachment 4).

After lunch break, Richard Stewart and myself returned to examine additional EOI records. We then returned to the drum storage area for additional photos. Mr. Kirk Hayward then met with us and answered our questions about the transport operations of EES and showed us the fleet of EES trucks that were on the site that day.

We met one more time with Susan Keene to examine inspection logs and hazardous waste personnel and training records. Susan Keene could not produce documentation for any EOI "weekly" inspection more recent than February 11, 1990 and in response to my questions, confirmed that February 11, 1990 was the last time EOI personnel had inspected the areas listed on the EOI "Inspection Checklist Schedule: Weekly Inspection" log (attachment 3). I observed that the EOI inspection checklist did not list the generator drum storage area as an area to be inspected. I also observed that none of the EOI training courses required for hazardous waste personnel included any material covering the proper management of hazardous wastes. Susan Keene also could not produce any training records that documented whether or not Todd Hutcheon, the EOI Operations Superintendent, had taken any type of training at all.

The EOI hazardous waste tanks were not evaluated during this inspection and no samples were taken.

In a series of telephone conversations after completion of the field inspection, Susan Keene stated and confirmed that

when EOI receives waste oil contaminated with greater that 1000 ppm halogenated hydrocarbon compounds, EOI pumps out the entire load of hazardous waste into a stationary tank (tank 502) and then later pumps the load to another tanker truck and transfers it to Systech, another off-site facility, for treatment. According to EOI manifest records, waste oil contaminated with greater that 1000 ppm halogenated hydrocarbon compounds have been transferred off-site in this manner at least 47 times between October 5, 1989 and March 31, 1990. I noted that the EOI Hazardous Waste Facility Permit, Operation Plan, and August 24, 1988 Variance permit EOI to accept, store, and treat only waste oil and waste ethylene glycol.

Review of EOI's Closure Cost Estimate by the Department's Financial Responsibility Unit revealed that EOI had not adjusted the facility Closure Cost Estimate for inflation and had not submitted the adjusted cost estimate to the Department by March 1, 1990.

IX. Discussion with Management

The above violations were briefly discussed in a general format with Susan Keene.

Susan Keene responded by stating that she will inform the entire facility, including management, of each of the potential violations and that they will be corrected as soon as possible. In regards to violation no. 1, Ms. Keene stated that EOI has evaluated the regulations and has received guidance from the Department's Alternative Technology Division which indicated to EOI that the pumping and transfer of contaminated waste oil as described in this report was permitted by the applicable regulations.

X. Attachments

1. Facility Map, 1 pg.
2. Photographs, 16 pgs.
3. EOI Weekly Inspection Log, 1 pg.
4. EES Hazardous Waste Manifests, 9 pgs.
5. Generator Checklist, 20 pgs.
6. Transporter Checklist, 16 pgs.

Gregory Grunner
Hazardous Materials Specialist

4/20/90
Date Submitted

Patricia Payne
Senior Hazardous Materials Specialist

4/20/90
Date Approved

Attachment K


DEXSIL
CLOR-D-TECT™
Q4000
Quantitative
Screening Kit
RANGE 0-4000 PPM
Disposable test kit for the quantitative determination of total chlorine (halogens) in used oil.
CAUTION: This kit contains metallic sodium. Metallic sodium is a flamable solid and water reactive. Read enclosed instructions carefully before doing this test. Keep out of reach of children.